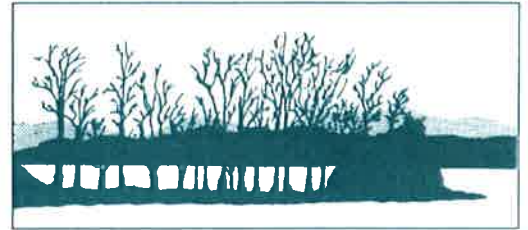


Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Asbestos Containing Materials
Middlebury Gas & Oil Building, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional asbestos inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 on/within the Middlebury Administrative Site, Gas & Oil Building, 1007 US Route 7 South, Middlebury, Vermont. Inspection activities were limited to evaluation of accessible suspect asbestos containing materials.

On July 8, 2019, CPAI collected three (3) bulk samples from suspect asbestos containing materials. All bulk samples were submitted to a Vermont certified analytical service. All bulk samples were analyzed by Polarized Light Microscopy (PLM), Visual Estimation Method, according to EPA Method 600/R-93/116. Identification of asbestos by PLM is based on optical crystallographic properties, and gives a qualitative differentiation between types of asbestos and other fibrous materials. It also allows for a quantitative estimate of percent asbestos using EPA approved methods.

A Drawing depicting existing conditions/CPAI Area Numbers, The Bulk Sample Analysis Inventory (Table 1), the analytical service bulk sample analysis report and CPAI/analytical service certification information are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

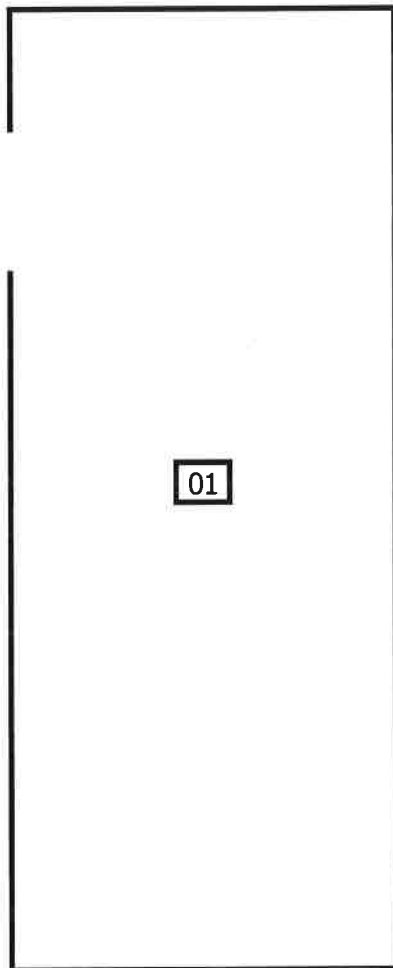
A handwritten signature in dark ink, appearing to read 'Todd C. Hobson'. The signature is fluid and cursive, with a long, sweeping underline.

Todd C. Hobson
President

Middlebury Gas & Oil Building



Project North



00 = CPAI Area Number

Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury Vermont

Asbestos Inspection
Not to Scale
Drawn by: Todd C. Hobson



Table 1
Bulk Sample Analysis Inventory

Building/Addition: USFS/Middlebury Administrative Site
Middlebury Gas & Oil Building
1007 US Route 7 South
Middlebury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Roofing Shingles, green	07081915014-34	07/08/19	1930319-001	Exterior, east pitch, at north edge, center section.	NAD
Concrete	07081915014-39	07/08/19	1930317-002	Exterior, east elevation, from south edge of poured slab.	NAD
	07081915014-37	07/08/19	1930317-003	Exterior, east elevation, from east edge, center of poured slab.	NAD

PLM = Polarized Light Microscopy
NAD = No Asbestos Detected

* = An additional sample of this suspect asbestos material was collected from the Middlebury Workshop



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston VT 05495

Project Reference: 15014-Batch #3
Laboratory Batch #: 1930317
Date Samples Received: 07/09/2019
Date Samples Analyzed: 07/16/2019
Date of Final Report: 07/16/2019

SAMPLE IDENTIFICATION:

Three (3) samples from CPAI Project #: 15014 - Batch #3 project were submitted by Todd Hobson on 07/09/2019

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-600/M4-82-020, EPA-600/ R-93-116). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter ($<0.25\mu\text{m}$) may not be detected by the PLM method. Floor tile and other resinously bound material may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additional analytical methods may be required. Optimum recommends using Transmission Electron Microscopy (TEM) for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

Use of the NVLAP and AIHA Logo in no way constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit $<1\%$, Reporting Limits: CVES = 1%, 400 Point Count = .25%, 1000 Point Count = 0.1%; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director

Kristina Scaviola
Laboratory Supervisor



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #3

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930317
PROJECT #: 15014-Batch #3
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/16/2019
REPORT DATE: 07/16/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
1930317-001 07081915014.34	Bulk Material, Black	LAYER 1 100%	None Detected	Cellulose Fiber 1% Fibrous Glass 35% Binder/Filler 64%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930317-002 07081915014.39	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930317-003 07081915014.37	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%

**Analyst
Signatory:**
Jamie Noel

NVLAP
Lab Code: 101433-0



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #3

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930317
PROJECT #: 15014-Batch #3
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/16/2019
REPORT DATE: 07/16/2019
ANALYST: Jamie Noel



Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

CPAI Proj #:

15014

		Type			Sample Number(s)
Asst?	Cont?	Air	Boil	H2O	
X			X		070815014-34,37,39

	Date	Time	Name	Signature
Transfer #1	07.08.19	18:52	Todd Hobson	
to:	Sent to		Optimum by FedEx	
Transfer #2	7/9/19	12 ⁵⁰	Molly Morris	
to:				
Transfer #3				
to:				

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #3

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930317
PROJECT #: 15014-Batch #3
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/16/2019
REPORT DATE: 07/16/2019
ANALYST: Jamie Noel

1930317

Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Batch 3

5 day
turnaround

Date of Submission: 08 July 2019 CPAI Proj. #: 15014

Analytical Service: Optimum

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
07081915014.34	07.08.19	PLM	1	Analyze PLM
.39	↓	↓	2	↓
.37	↓	↓	3	↓

Chain of Custody Form Attached?

Yes No

Consultant Signature: [Signature] Page No.: 1 of 1

07/16/19 12:50

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600

ASBESTOS CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: CE998564

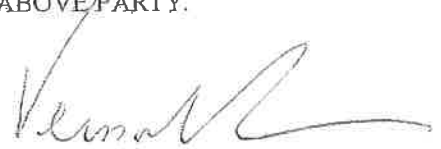
EXPIRES: Monday, April 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to be "Vernon", is written over the bottom right portion of the certificate text.

ASBESTOS INSPECTOR/MANAGEMENT PLANNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: MP262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT DESIGNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PD262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT MONITOR

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

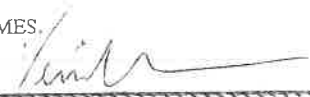
LICENSE: PM262143

EXPIRES: Sunday, March 01, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS ANALYTICAL SERVICES

OPTIMUM ANALYTICAL AND CONSULTING, LLC
85 STILES ROAD, STE. 201
SALEM, NH 03078

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: AL143503

EXPIRES: Wednesday, June 17, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

AIR ANALYSIS BY PCM

BULK ANALYSIS BY PLM

A handwritten signature in dark ink, appearing to be 'C. M.', is located to the right of the 'BULK ANALYSIS BY PLM' text.

ASBESTOS PCM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PA307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PLM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PB307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos Pcm Analyst
Not a Legal Form of ID

JAMIE L. NOEL

Eff. Date 02/11/19
Exp. Date 02/11/20

CONES
PA307779



Renewal



VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos Plm Analyst
Not a Legal Form of ID

JAMIE L. NOEL

Eff. Date 02/11/19
Exp. Date 02/11/20

CONES
PB307779

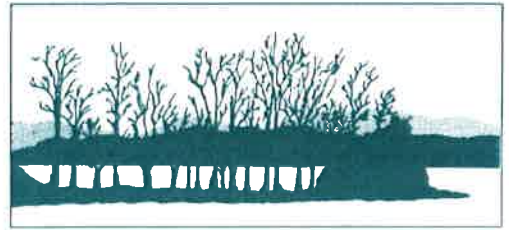


Renewal



Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Report of Lead-Based Paint Inspection
Middlebury Gas & Oil Building, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed for your review is the Clay Point Associates, Inc. (CPAI) report related to the lead-based paint inspection performed on July 8, 2019 on/within the Middlebury Administrative Site, Middlebury Gas and Oil Building, 1007 US Route 7 South, Middlebury Vermont. The inspection was performed in accordance with the guidelines outlined in Chapter 7: Lead-Based Paint Inspection of the U.S. Department of Housing and Urban Development's, "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing", July 2012 revision (HUD).

For your information, lead-based paint was not detected on/within the structure.

On-site testing was performed by use of a portable x-ray fluorescence analyzer (XRF). Specifically, a RMD Instruments, LLC., Lead Paint Analysis System (LPA-1), serial number #2471, was used by CPAI to inspect all accessible painted/stained surfaces. The XRF calibration was checked according to the manufacturer's recommendations and the guidelines outlined in the December 1, 2015, Performance Characteristic Sheet (PCS) for the above referenced instrument. In addition, precautionary measures were taken to ensure that building occupants, inspectors, and escorts were not inadvertently exposed to radiation as a result of testing.

Attached are copies of the "Lead-Based Paint Testing Data Sheets" generated during the inspection. The sheets reference locations in each room/area where representative XRF testing was performed. Walls in each room/area were assigned an A, B, C or D letter notation. The A Wall in each room/area is always at the street side of the building (US Route 7 South). Notations then proceed clockwise from the A wall to the B, C and D walls. If more than one door or window is on one particular wall, the #1 door/ window is always on the inspector's left as s/he faces the wall. Notations then proceed left to right from 1, to 2, to 3, etc. Also attached please find "Lead Survey Building Sketches" which provide room/area numbers and descriptions of each room's use (i.e. Kitchens, Bathrooms, Bedrooms, etc.).

Mr. David Donahue
October 16, 2019
Page 2

XRF readings are classified into two categories: positive (lead-based paint) and negative (not defined as lead-based paint). The appropriate category is noted in the far right column on the Lead-Based Paint Testing Data Sheets. The Vermont Regulations For Lead Control, V.S.A. Title 18, Chapter 38, Effective October 2, 1994, amended May 1, 2001, defines Lead-Based Paint in target housing and daycare facilities as "paint or other surface coatings that contain lead in excess of 1.0 mg/sq. cm. or 0.5 percent by weight (5,000 ppm), or (1) in the case of paint or other surface coatings such lower level as may be established by the Secretary of Housing and Urban Development, as defined by Section 302 (c) of the Lead Based Paint Poisoning Prevention Act, or (2) in the case of any other paint or surface coatings, such other level as may be established by the Administrator of EPA." The Vermont Occupational Safety and Health Administration (VOSHA) does not specify a regulated quantity of lead within paint. Applicable VOSHA regulations address the presence of lead within paint regardless of specific quantity present.

Please note that this document does not provide a comprehensive inventory of components with lead-based paint. This is because protocols do not require testing of every inch of a painted/ stained surface.

Components with the same paint history as those tested may contain lead-based paint within each room or on the building exterior (i.e., under the currently visible paint layer). In addition, protocols do not require testing of more than one item from the same testing component within each room (i.e., if more than one window was present in a room, and if CPAI tested window components from one window and they were positive, then the same window components from the other windows in the room should be assumed to be positive).

All lead-based paint inspection activities were performed by Todd C Hobson. Mr. Hobson is a State of Vermont certified Lead Inspector Technician I (#IT732966). Specific hours of on-site testing are available upon request.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this inspection report, or require additional services, please contact us at (802) 879-2600.

Sincerely,
CLAY POINT ASSOCIATES, INC.

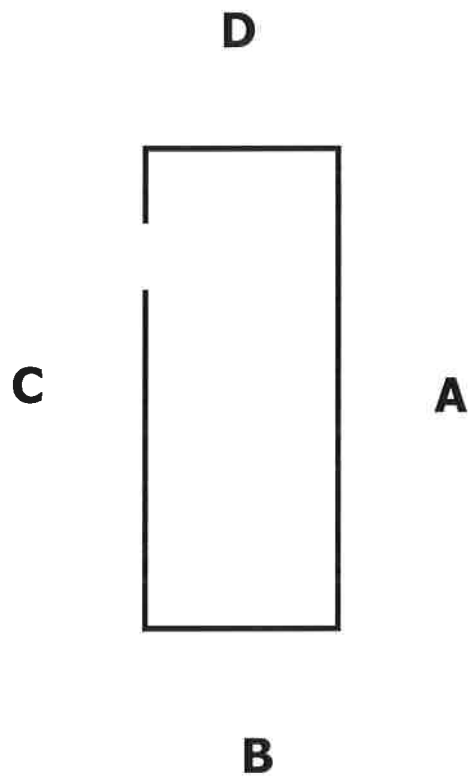


Todd C. Hobson
President



Project North

Middlebury Gas & Oil Building

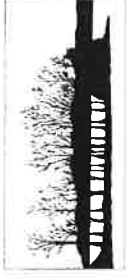


 = CPAI Area Number

Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury, Vermont

Lead-Based Paint Inspection
Not to Scale
Drawn by: Todd Hobson



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7 South, Middlebury, Vermont

Middlebury Gas and Oil Building

DATE: July 8, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 01

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
278	Ceiling	White	Wood	Deter.	Only two boards of ceiling	- 0.2	Neg.
279	Shelves	Red	Wood	Deter.	Wall A	- 0.3	Neg.
280	Shelves	Red	Wood	Deter.	Wall C	- 0.4	Neg.
281	Shelves	Red	Wood	Deter.	Wall D	- 0.1	Neg.
282	Wall	Red	Wood	Deter.	Wall A	- 0.4	Neg.
283	Wall	Red	Wood	Deter.	Wall D	- 0.2	Neg.

- Remaining components are unpainted/unstained.
- Walls B and C are unpainted/unstained.
- Floor is unpainted cement slab.

LEAD CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: LC200999

EXPIRES: Monday, March 23, 2020

**CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM**

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

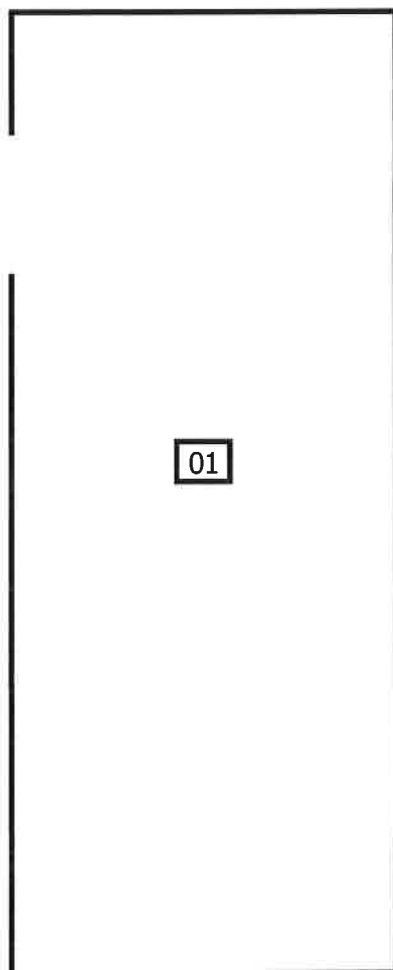
COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in black ink, appearing to be 'C. L.' or similar, located on the right side of the certificate.

Middlebury Oil & Gas Building



Project North



00 = CPAI Area Number

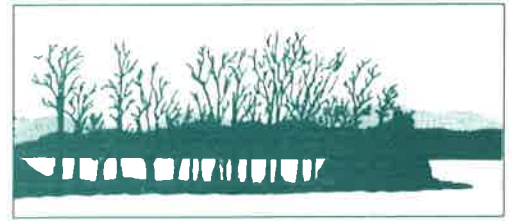
Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury Vermont

Universal Waste Inspection
Not to Scale
Drawn by: Todd C. Hobson

Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Universal/Electronic Waste
Middlebury Gas & Oil Building, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional environmental inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 within the Middlebury Administrative Site, Gas & Oil Building, 10097 US Route 7 South, Middlebury, Vermont.

During the inspection, CPAI identified all universal/electronic waste inside the building. This inventory did not include underground storage tanks (USTs), or any other subsurface materials/contamination that may be present at the site.

A Drawing depicting CPAI Area Numbers and the Approximate Inventory of Universal/Electronic Waste (Table 1) are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

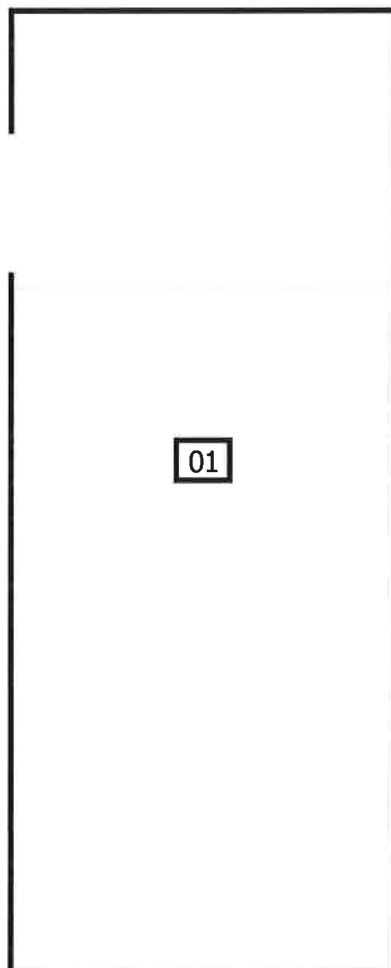
A handwritten signature in blue ink, appearing to read 'Todd C. Hobson', with a stylized flourish at the end.

Todd C. Hobson
President

Middlebury Gas & Oil Building



Project North



00 = CPAI Area Number

Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury Vermont

Universal Waste Inspection
Not to Scale
Drawn by: Todd C. Hobson

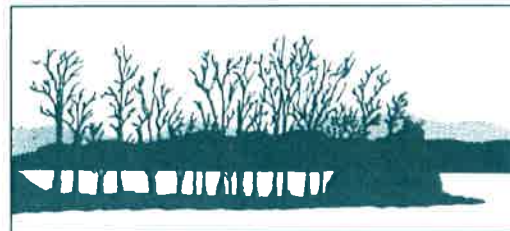
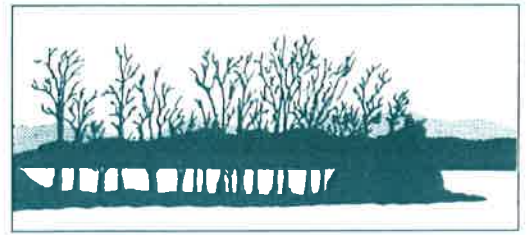


Table 1
Approximate Inventory of Universal Waste

Building/Addition:		USFS/Middlebury Administrative Site Middlebury Gas & Oil Building 1007 US Route 7 South Middlebury, Vermont	
CPAI Area No.	Equipment/Item	Approx. Quantity	General Location
01	Oil Staining	4 sq. ft.	On floor (slab) in southeast section.
	Oil Staining	Misc.	On some shelves.

Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Asbestos Containing Materials
Middlebury Butler Building, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional asbestos inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 on/within the Middlebury Administrative Site, Butler Building, 1007 US Route 7 South, Middlebury, Vermont. Inspection activities were limited to evaluation of accessible suspect asbestos containing materials.

On July 8, 2019, CPAI collected six (6) bulk samples from suspect asbestos containing materials. All bulk samples were submitted to a Vermont certified analytical service. Five (5) bulk samples were analyzed by Polarized Light Microscopy (PLM), Visual Estimation Method, according to EPA Method 600/R-93/116. Identification of asbestos by PLM is based on optical crystallographic properties, and gives a qualitative differentiation between types of asbestos and other fibrous materials. It also allows for a quantitative estimate of percent asbestos using EPA approved methods. One (1) sample was not analyzed in accordance with our stop positive protocol.

A Drawing depicting existing conditions/ CPAI Area Numbers, The Bulk Sample Analysis Inventory (Table 1), the Inventory of Asbestos Containing Materials (Table 2), analytical service bulk sample analysis report and CPAI/analytical service certification information are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

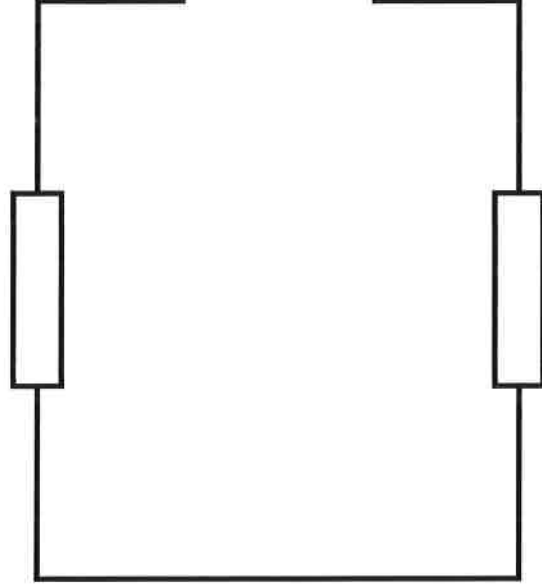
A handwritten signature in dark ink, appearing to read 'Todd C. Hobson'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Todd C. Hobson
President

Butler Building



Project North



Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Rt. 7 South
Middlebury, Vermont

Asbestos Inspection
Not to Scale
Drawn by: Todd C. Hobson



Table 1
Bulk Sample Analysis Inventory

Building/Addition: USFS/Middlebury Administrative Site
Butler Building
1007 US Route 7 South
Middlebury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Window Glazing	07081915014-36	07/08/19	1930316-001	CPAI Area #01, south window.	2% Chrys.
	07081915014-31	07/08/19	1930316-002	CPAI Area #01, north window.	2% Chrys.
Caulking assoc. w/ round vent	07081915014-35	07/08/19	1930316-003	Exterior, west elevation.	3% Chrys.
	07081915014-38	07/08/19	1930316-004	Exterior, east elevation.	n/a
Concrete	07081915014-09	07/08/19	1930316-005	Exterior, from southeast corner, poured floor (slab).	NAD
	07081915014-40	07/08/19	1930316-006	Exterior, from southwest corner, poured floor (slab).	NAD

PLM = Polarized Light Microscopy
NAD = No Asbestos Detected
Chrys. = Chrysotile Asbestos
n/a = sample not analyzed (stop at first positive result in group)

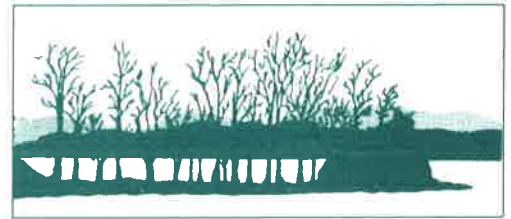


Table 2
Inventory of Asbestos Containing Materials

Location:		USFS/Middlebury Administrative Site Middlebury Butler Building 1007 US Route 7 South Middlebury, Vermont	
CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
01 (Main Area)	Window Glazing	2 sq. ft.	On window sashes associated with north and south windows.
Exterior	Caulking, assoc. w/ round vents	2 sq. ft.	At edges of round vents (2) on gable end walls near roof peak.



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston VT 05495

Project Reference: 15014-Batch #2
Laboratory Batch #: 1930316
Date Samples Received: 07/09/2019
Date Samples Analyzed: 07/16/2019
Date of Final Report: 07/16/2019

SAMPLE IDENTIFICATION:

Six (6) samples from CPAI Project #: 15014 - Batch #2 project were submitted by Todd Hobson on 07/09/2019

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-600/M4-82-020, EPA-600/ R-93-116). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter ($<0.25\mu\text{m}$) may not be detected by the PLM method. Floor tile and other resinously bound material may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additional analytical methods may be required. Optimum recommends using Transmission Electron Microscopy (TEM) for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

Use of the NVLAP and AIHA Logo in no way constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit $<1\%$, Reporting Limits: CVES = 1% , 400 Point Count = $.25\%$, 1000 Point Count = 0.1% ; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director

Kristina Scaviola
Laboratory Supervisor



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #2

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930316
PROJECT #: 15014-Batch #2
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/16/2019
REPORT DATE: 07/16/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
1930316-001 07081915014.36	Bulk Material, Gray	LAYER 1 100%	Chrysotile	2%	Cellulose Fiber Binder/Filler	1% 97%
Total % Asbestos:				2.0%	Total % Non-Asbestos:	98.0%
1930316-002 07081915014.31	Bulk Material, Gray	LAYER 1 100%	Chrysotile	2%	Cellulose Fiber Binder/Filler	1% 97%
Total % Asbestos:				2.0%	Total % Non-Asbestos:	98.0%
1930316-003 07081915014.35	Bulk Material, White	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
Total % Asbestos:				3.0%	Total % Non-Asbestos:	97.0%
1930316-004 07081915014.38	Bulk Material, White Note: Positive Stop	LAYER 1 100%				
1930316-005 07081915014.09	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
Total % Asbestos:				No Asbestos Detected	Total % Non-Asbestos:	100.0%
1930316-006 07081915014.40	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
Total % Asbestos:				No Asbestos Detected	Total % Non-Asbestos:	100.0%

**Analyst
Signatory:**
Jamie Noel

NVLAP
Lab Code: 101433-0



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
 ADDRESS: P.O. Box 1254
 CITY / STATE / ZIP: Williston VT 05495
 CONTACT: Todd Hobson
 DESCRIPTION: PLM Analysis
 LOCATION: CPAI Project #: 15014 - Batch #2

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930316
 PROJECT #: 15014-Batch #2
 DATE COLLECTED: 07/08/2019
 COLLECTED BY: Todd Hobson
 DATE RECEIVED: 07/09/2019
 ANALYSIS DATE: 07/16/2019
 REPORT DATE: 07/16/2019
 ANALYST: Jamie Noel

1930316



Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

CPAI Proj. #

15014

Asst?	Cdt?	Type		H2O	Sample Number(s)
		Air	Bulk		
X			X		6708 K15014. 29, 31, 35, 36, 38, 40

	Date	Time	Name	Signature
Transfer #1	07.08.19	18:52	Todd Hobson	
to		Sent to	Optimum by	FedEx
Transfer #2	7/9/19	12 ⁵⁰	Holly MORRIS	
to				
Transfer #3				
to				

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #2

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930316
PROJECT #: 15014-Batch #2
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/16/2019
REPORT DATE: 07/16/2019
ANALYST: Jamie Noel

1930316



Clay Point Associates, Inc.

5 day
turnaround

BULK SAMPLE ANALYSIS REQUEST FORM Batch 2

Date of Submission: 08 July 2019 CPAI Proj. #: 15014

Analytical Service: Optimum

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
07081915014.36	07.08.19	PLM	1	Analyze PLM
.31	↓	↓	2	↓
.35	↓	↓	3	Stop Positive
.38	↓	↓	3	↓
.09	↓	↓	4	Analyze PLM
.40	↓	↓	5	↓

Chain of Custody Form Attached?

Yes No

Consultant Signature: [Signature] Page No.: 1 of 1

Submitting 7/9/19 12:50

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600

ASBESTOS CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: CE998564

EXPIRES: Monday, April 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to be "Vernon", is written over the bottom right portion of the certificate text.

ASBESTOS INSPECTOR/MANAGEMENT PLANNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

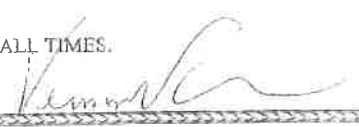
LICENSE: MF262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT DESIGNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PD262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT MONITOR

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PM262143

EXPIRES: Sunday, March 01, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS ANALYTICAL SERVICES

OPTIMUM ANALYTICAL AND CONSULTING, LLC
85 STILES ROAD, STE 201
SALEM, NH 03078

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: AL143503

EXPIRES: Wednesday, June 17, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.
COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

AIR ANALYSIS BY PCM

BULK ANALYSIS BY PLM

A handwritten signature in blue ink, appearing to be 'C. M.', is located to the right of the 'BULK ANALYSIS BY PLM' text.

ASBESTOS PCM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PA307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PLM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PB307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos Pcm Analyst
Not a Legal Form of ID

JAMIE L. NOEL

Eff. Date 02/11/19
Exp. Date 02/11/20

CONES
PA307779



Renewal



VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos Plm Analyst
Not a Legal Form of ID

JAMIE L. NOEL

Eff. Date 02/11/19
Exp. Date 02/11/20

CONES
PB307779

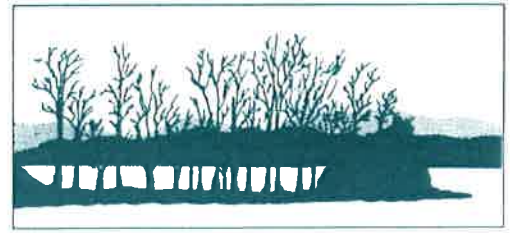


Renewal



Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Report of Lead-Based Paint Inspection
Butler Building, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed for your review is the Clay Point Associates, Inc. (CPAI) report related to the lead-based paint inspection performed on July 8, 2019 on/within the Middlebury Administrative Site, Butler Building, 1007 US Route 7 South, Middlebury Vermont. The inspection was performed in accordance with the guidelines outlined in Chapter 7: Lead-Based Paint Inspection of the U.S. Department of Housing and Urban Development's, "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing", July 2012 revision (HUD).

For your information, no lead-based paint was detected on/within the structure.

On-site testing was performed by use of a portable x-ray fluorescence analyzer (XRF). Specifically, a Viken Detection Pb200i Handheld XRF Lead Paint Analyzer, serial number #2074, was used by CPAI to inspect all accessible painted/stained surfaces. The XRF calibration was checked according to the manufacturer's recommendations and the guidelines outlined in the December 1, 2006, Performance Characteristic Sheet (PCS) for the above referenced instrument. In addition, precautionary measures were taken to ensure that building occupants, inspectors, and escorts were not inadvertently exposed to radiation as a result of testing.

Attached are copies of the "Lead-Based Paint Testing Data Sheets" generated during the inspection. The sheets reference locations in each room/area where representative XRF testing was performed. Walls in each room/area were assigned an A, B, C or D letter notation. The A Wall in each room/area is always at the street side of the building (US Route 7 South). Notations then proceed clockwise from the A wall to the B, C and D walls. If more than one door or window is on one particular wall, the #1 door/ window is always on the inspector's left as s/he faces the wall. Notations then proceed left to right from 1, to 2, to 3, etc. Also attached please find "Lead Survey Building Sketches" which provide room/area numbers and descriptions of each room's use (i.e. Kitchens, Bathrooms, Bedrooms, etc.).

Mr. David Donahue
October 16, 2019
Page 2

XRF readings are classified into two categories: positive (lead-based paint) and negative (not defined as lead-based paint). The appropriate category is noted in the far right column on the Lead-Based Paint Testing Data Sheets. The Vermont Regulations For Lead Control, V.S.A. Title 18, Chapter 38, Effective October 2, 1994, amended May 1, 2001, defines Lead-Based Paint in target housing and daycare facilities as "paint or other surface coatings that contain lead in excess of 1.0 mg/sq. cm. or 0.5 percent by weight (5,000 ppm), or (1) in the case of paint or other surface coatings such lower level as may be established by the Secretary of Housing and Urban Development, as defined by Section 302 (c) of the Lead Based Paint Poisoning Prevention Act, or (2) in the case of any other paint or surface coatings, such other level as may be established by the Administrator of EPA." The Vermont Occupational Safety and Health Administration (VOSHA) does not specify a regulated quantity of lead within paint. Applicable VOSHA regulations address the presence of lead within paint regardless of specific quantity present.

Please note that this document does not provide a comprehensive inventory of components with lead-based paint. This is because protocols do not require testing of every inch of a painted/ stained surface.

Components with the same paint history as those tested may contain lead-based paint within each room or on the building exterior (i.e., under the currently visible paint layer). In addition, protocols do not require testing of more than one item from the same testing component within each room (i.e., if more than one window was present in a room, and if CPAI tested window components from one window and they were positive, then the same window components from the other windows in the room should be assumed to be positive).

All lead-based paint inspection activities were performed by Todd C Hobson. Mr. Hobson is a State of Vermont certified Lead Inspector Technician I (#IT732966). Specific hours of on-site testing are available upon request.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this inspection report, or require additional services, please contact us at (802) 879-2600.

Sincerely,
CLAY POINT ASSOCIATES, INC.

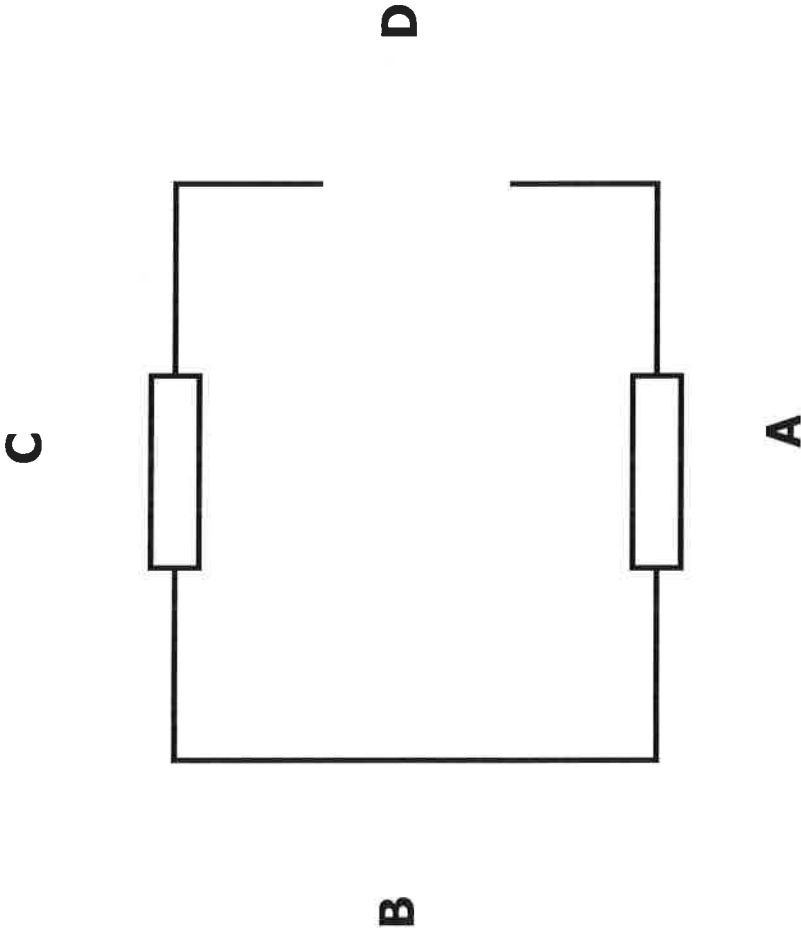


Todd C. Hobson
President

Butler Building



Project North



US Rt. 7

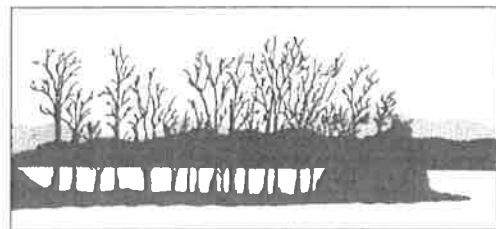
Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Rt. 7 South
Middlebury, Vermont

Lead-Based Paint Inspection
Not to Scale
Drawn by: Todd C. Hobson

Clay Point Associates, Inc.

www.claypointassociates.com



Calibration Check Test Results

ADDRESS: Commercial Structures
1007 US Route 7
Middlebury, Vermont

DATE: 07/08/19
INSPECTOR: Todd C. Hobson
XRF SERIAL NO.: 2471

Start Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
9:32	01	1.1
	02	1.0
	03	1.1
	Average:	1.1

Start Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
9:41	04	- 0.1
	05	- 0.2
	06	- 0.2
	Average:	-0.2

Mid Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
1:15	272	1.1
	273	1.0
	274	1.0
	Average:	1.0

Mid Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
1:26	275	- 0.2
	276	- 0.1
	277	- 0.2
	Average:	- 0.2

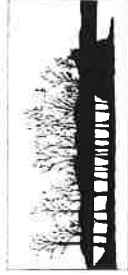
End Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
2:52	292	1.0
	293	1.1
	294	1.1
	Average:	1.1

End Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
3:01	295	- 0.2
	296	- 0.2
	297	- 0.2
	Average:	- 0.2

Calibration Check Tolerance Used **1.0 mg./sq. cm.**
XRF Calibration Check Limits: 0.7 mg./sq. cm. to 1.3 mg./sq. cm. (inclusive)

Inspector Signature: _____

LEAD BASED PAINT TESTING DATA SHEET



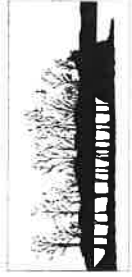
Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont Butler Building DATE: July 8, 2019
XRF SERIAL NO.: 2471 ROOM EQUIVALENT: 01 INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
284	Door	Grey	Metal	Deter.	Wall D, Door 1	- 0.2	Neg.
285	Door Casing	Grey	Metal	Deter.	Wall D, Door 1	- 0.1	Neg.
286	Door Jamb	Grey	Metal	Deter.	Wall D, Door 1	- 0.1	Neg.
287	Shelves	Red	Wood	Deter.	Wall A	- 0.3	Neg.
288	Shelves	Black	Metal	Deter.	Wall B	- 0.1	Neg.
289	Shelves	Red	Wood	Deter.	Wall C	- 0.1	Neg.
290	Wall Support	Red	Metal	Intact	Wall Support	- 0.2	Neg.

- Window B-1 and D-1 components are unpainted/unstained wood.
- All walls are unpainted metal.
- Floor is unpainted concrete slab.

LEAD BASED PAINT TESTING DATA SHEET



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Butler Building

DATE: July 8, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: Exterior

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
291	Roof	Green	Metal	Deter.		- 0.0	Neg.

- All remaining exterior components are unpainted.

LEAD CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: LC200999

EXPIRES: Monday, March 23, 2020

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to be 'C. L.' or similar, located to the right of the text 'COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.'

LEAD INSPECTOR TECHNICIAN I

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: IT732966

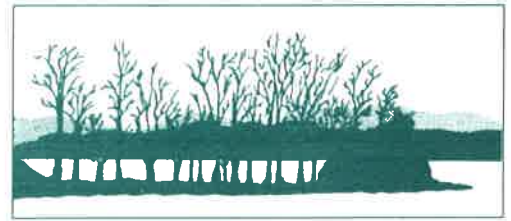
EXPIRES: Wednesday, February 26, 2020

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.





October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Universal/Electronic Waste
Butler Building, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional environmental inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 within the Middlebury Administrative Site, Butler Building, 10097 US Route 7 South, Middlebury, Vermont.

During the inspection, CPAI identified all universal/electronic waste inside the building. This inventory did not include underground storage tanks (USTs), or any other subsurface materials/contamination that may be present at the site.

A Drawing depicting CPAI Area Numbers and the Approximate Inventory of Universal/Electronic Waste (Table 1) are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

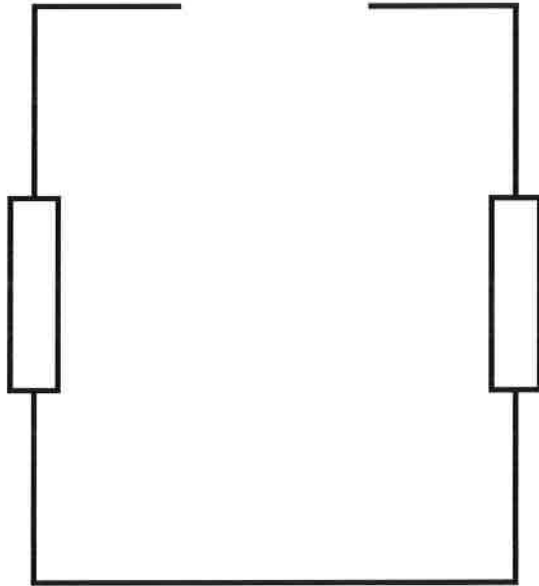
A handwritten signature in blue ink, appearing to read 'Todd C. Hobson'. The signature is fluid and cursive, with a long horizontal stroke at the end.

Todd C. Hobson
President

Butler Building



Project North



Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Rt. 7 South
Middlebury, Vermont

Universal Waste Inspection
Not to Scale
Drawn by: Todd C. Hobson

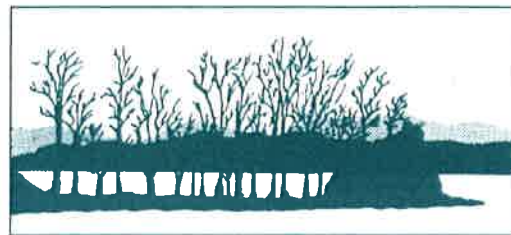
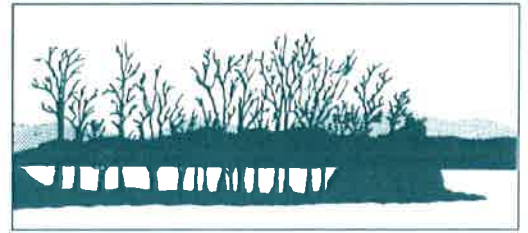


Table 1
Approximate Inventory of Universal Waste

Building/Addition:		USFS/Middlebury Administrative Site Butler Building 1007 US Route 7 South Middlebury, Vermont	
CPAI Area No.	Equipment/Item	Approx. Quantity	General Location
Main Room	Oil Staining	Misc.	On floor (concrete slab) throughout area.

Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Asbestos Containing Materials
Middlebury Garage, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional asbestos inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 on/within the Middlebury Administrative Site, Garage, 1007 US Route 7 South, Middlebury, Vermont. Inspection activities were limited to evaluation of accessible suspect asbestos containing materials.

On July 8, 2019, CPAI collected two (2) bulk samples from suspect asbestos containing materials. All bulk samples were submitted to a Vermont certified analytical service. All bulk samples were analyzed by Polarized Light Microscopy (PLM), Visual Estimation Method, according to EPA Method 600/R-93/116. Identification of asbestos by PLM is based on optical crystallographic properties, and gives a qualitative differentiation between types of asbestos and other fibrous materials. It also allows for a quantitative estimate of percent asbestos using EPA approved methods.

A Drawing depicting existing conditions/CPAI Area Numbers, The Bulk Sample Analysis Inventory (Table 1), the analytical service bulk sample analysis report and CPAI/analytical service certification information are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

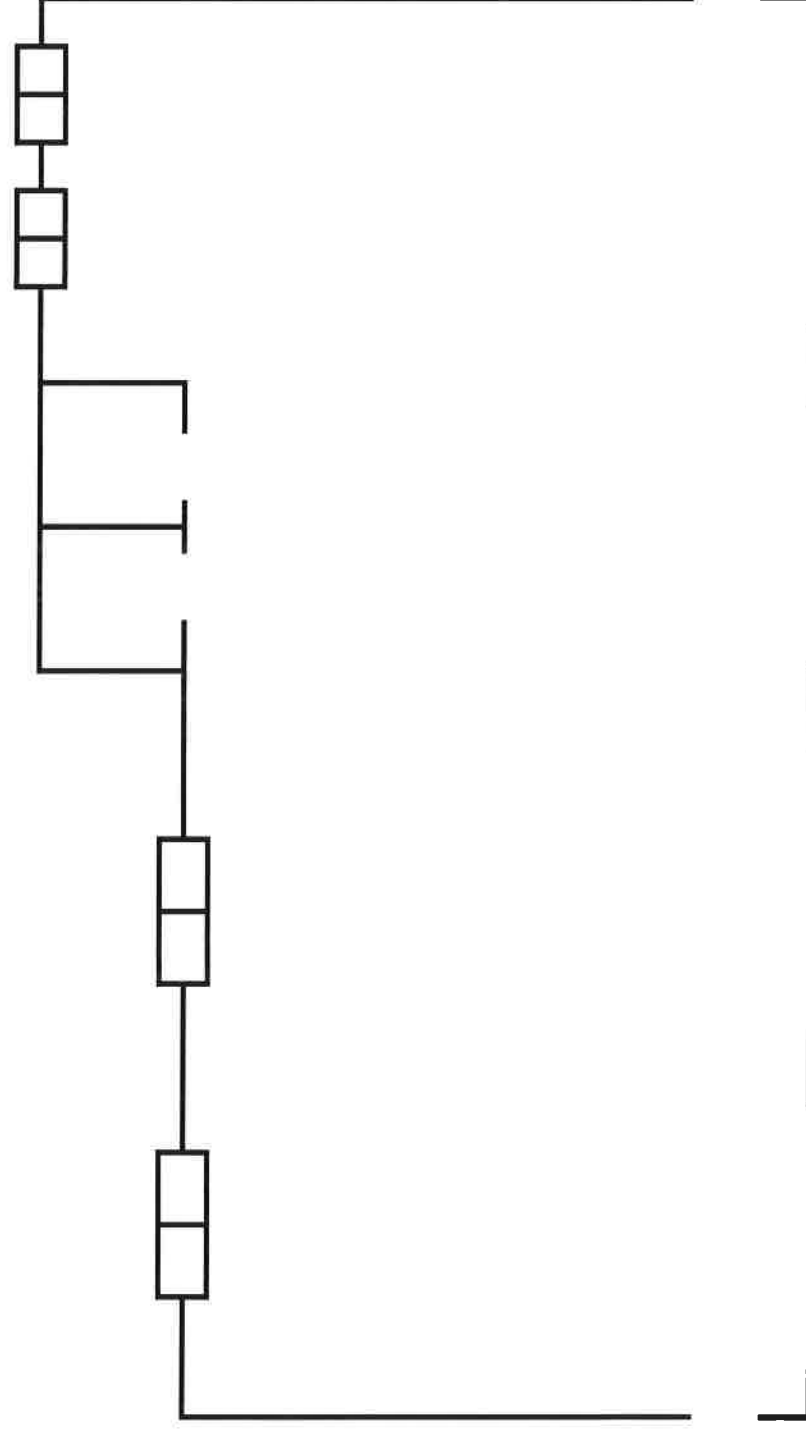
A handwritten signature in black ink, appearing to be 'Todd C. Hobson', written in a cursive style.

Todd C. Hobson
President

Middlebury Garage



Project North



Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury, Vermont

Asbestos Inspection
Not to Scale
Drawn by: Todd Hobson

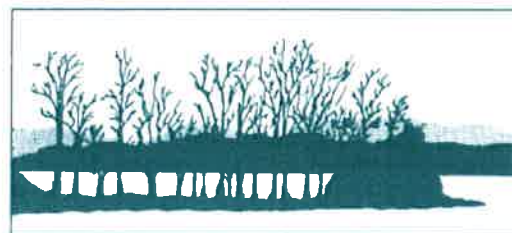


Table 1
Bulk Sample Analysis Inventory

Building/Addition: USFS/Middlebury Administrative Site
Middlebury Garage
1007 US Route 7 South
Middlebury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Concrete	07081915014-58	07/08/19	1930318-001	CPAI Area #01 (Main Area), 1 ft. 5 in. from south wall, 16 ft. 3 in. from easternmost wall.	NAD
	07081915014-56	07/08/19	1930318-002	CPAI Area #01 (Main Area), 10 ft. from north wall, 7 ft. 9 in. from east wall.	NAD

PLM = Polarized Light Microscopy
NAD = No Asbestos Detected



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston VT 05495

Project Reference: 15014-Batch #4
Laboratory Batch #: 1930318
Date Samples Received: 07/09/2019
Date Samples Analyzed: 07/16/2019
Date of Final Report: 07/16/2019

SAMPLE IDENTIFICATION:

Two (2) samples from CPAI Project #: 15014 - Batch #4 project were submitted by Todd Hobson on 07/09/2019

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-600/M4-82-020, EPA-600/ R-93-116). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter ($<0.25\mu\text{m}$) may not be detected by the PLM method. Floor tile and other resinously bound material may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additional analytical methods may be required. Optimum recommends using Transmission Electron Microscopy (TEM) for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

Use of the NVLAP and AIHA Logo in no way constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit $<1\%$, Reporting Limits: CVES = 1% , 400 Point Count = $.25\%$, 1000 Point Count = 0.1% ; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director

Kristina Scaviola
Laboratory Supervisor



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #4

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930318
PROJECT #: 15014-Batch #4
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/16/2019
REPORT DATE: 07/16/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
1930318-001 07081915014.58	Bulk Material, Gray/Beige	LAYER 1 100%	None Detected	Cellulose Fiber 8% Binder/Filler 92%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930318-002 07081915014.56	Bulk Material, Gray/Beige	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%

**Analyst
Signatory:**
Jamie Noel

NVLAP
Lab Code: 101433-0



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #4

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930318
PROJECT #: 15014-Batch #4
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/16/2019
REPORT DATE: 07/16/2019
ANALYST: Jamie Noel



Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

CPAI Proj #:

15014

Type					Sample Number(s)
Ash?	Oth?	Air	Pulk	H2O	
X			X		07081915014. SL, SB

	Date	Time	Name	Signature
Transfer #1	07.08.19	18:52	Todd Hobson	
to:		sent to	Optimum by	FedEx
Transfer #2	7/9/19	12 ⁵⁰	Holly McEels	
to:				
Transfer #3				
to:				

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #4

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930318
PROJECT #: 15014-Batch #4
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/16/2019
REPORT DATE: 07/16/2019
ANALYST: Jamie Noel

1930318

Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Batch 4

Date of Submission: 08 July 2019 CPAI Proj. #: 15014

Analytical Service: Optimum

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
07081915014.S6	07.08.19	PLM	1	Analyze PLM
S6	↓	↓	2	↓

Chain of Custody Form Attached?

☒ Yes ☐ No

Consultant Signature: [Signature] Page No.: 1 of 1

Submitting 7/9/19 12⁵⁰

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600

ASBESTOS CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: CE998564

EXPIRES: Monday, April 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to be a stylized name, possibly "Vernon" or similar, written over a faint, larger signature or stamp.

ASBESTOS INSPECTOR/MANAGEMENT PLANNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: MP262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT DESIGNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PD262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT MONITOR

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PM262143

EXPIRES: Sunday, March 01, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS ANALYTICAL SERVICES

OPTIMUM ANALYTICAL AND CONSULTING, LLC
85 STILES ROAD, STE 201
SALFORD, NH 03078

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: AL145503

EXPIRES: Wednesday, June 17, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.
COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

AIR ANALYSIS BY PCM

BULK ANALYSIS BY PLM

A handwritten signature in blue ink, appearing to be 'C. M.', is located to the right of the 'BULK ANALYSIS BY PLM' text.

ASBESTOS PCM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PA307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PLM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PB307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos PCM Analyst
Not a Legal Form of ID

JAMIE L. NOEL

Eff. Date 02/11/19
Exp. Date 02/11/20

CONES
PA307779



Renewal

VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos PLM Analyst
Not a Legal Form of ID

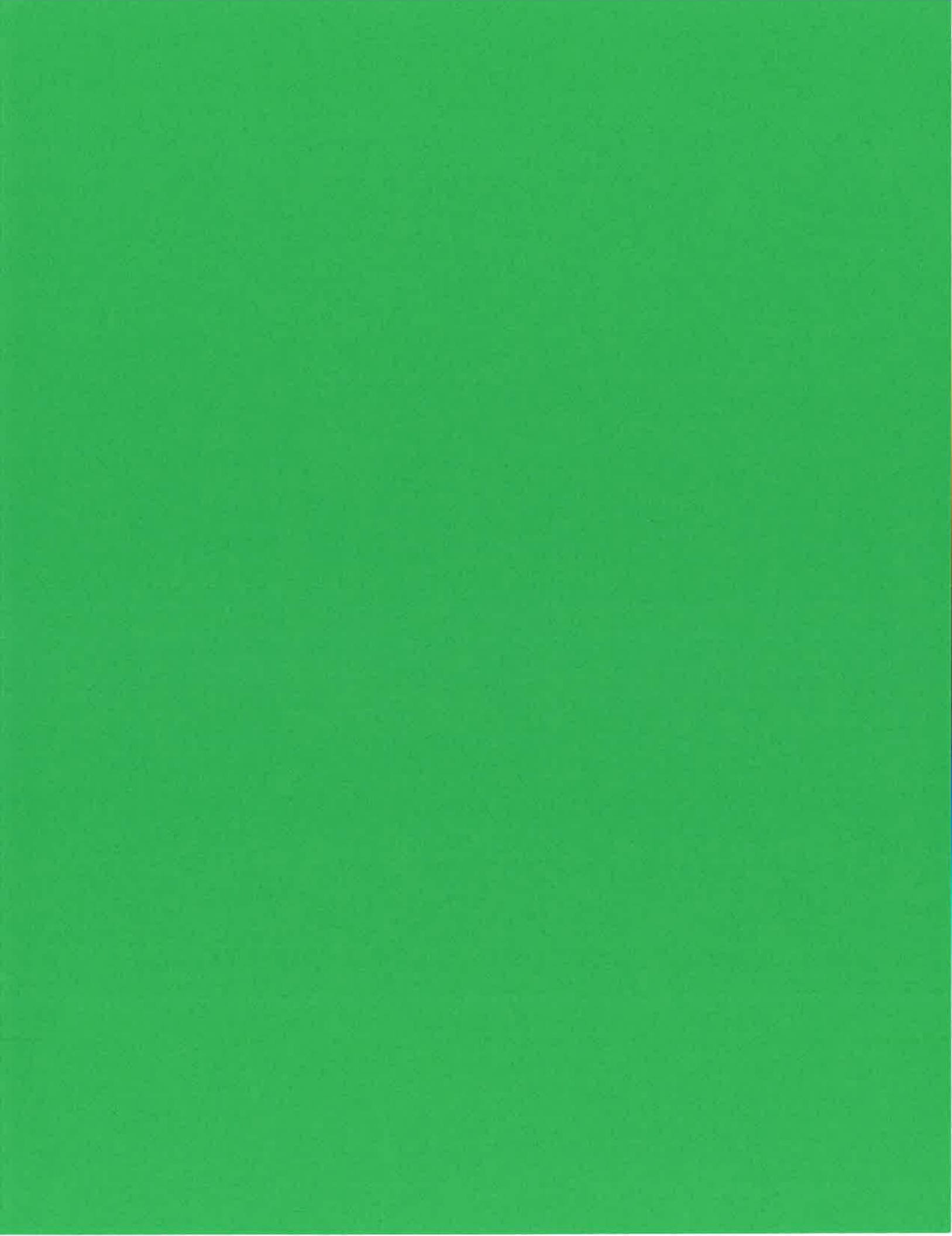
JAMIE L. NOEL

Eff. Date 02/11/19
Exp. Date 02/11/20

CONES
PB307779

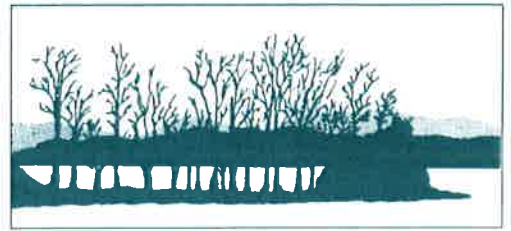


Renewal



Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Report of Lead-Based Paint Inspection
Garage, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed for your review is the Clay Point Associates, Inc. (CPAI) report related to the lead-based paint inspection performed on July 8, 2019 on/within the Middlebury Administrative Site, Garage, 1007 US Route 7 South, Middlebury Vermont. The inspection was performed in accordance with the guidelines outlined in Chapter 7: Lead-Based Paint Inspection of the U.S. Department of Housing and Urban Development's, "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing", July 2012 revision (HUD).

For your information, no lead-based paint was detected on/within the structure.

On-site testing was performed by use of a portable x-ray fluorescence analyzer (XRF). Specifically, a Viken Detection Pb200i Handheld XRF Lead Paint Analyzer, serial number #2074, was used by CPAI to inspect all accessible painted/stained surfaces. The XRF calibration was checked according to the manufacturer's recommendations and the guidelines outlined in the December 1, 2006, Performance Characteristic Sheet (PCS) for the above referenced instrument. In addition, precautionary measures were taken to ensure that building occupants, inspectors, and escorts were not inadvertently exposed to radiation as a result of testing.

Attached are copies of the "Lead-Based Paint Testing Data Sheets" generated during the inspection. The sheets reference locations in each room/area where representative XRF testing was performed. Walls in each room/area were assigned an A, B, C or D letter notation. The A Wall in each room/area is always at the street side of the building (US Route 7 South). Notations then proceed clockwise from the A wall to the B, C and D walls. If more than one door or window is on one particular wall, the #1 door/ window is always on the inspector's left as s/he faces the wall. Notations then proceed left to right from 1, to 2, to 3, etc. Also attached please find "Lead Survey Building Sketches" which provide room/area numbers and descriptions of each room's use (i.e. Kitchens, Bathrooms, Bedrooms, etc.).

Mr. David Donahue
October 16, 2019
Page 2

XRF readings are classified into two categories: positive (lead-based paint) and negative (not defined as lead-based paint). The appropriate category is noted in the far right column on the Lead-Based Paint Testing Data Sheets. The Vermont Regulations For Lead Control, V.S.A. Title 18, Chapter 38, Effective October 2, 1994, amended May 1, 2001, defines Lead-Based Paint in target housing and daycare facilities as "paint or other surface coatings that contain lead in excess of 1.0 mg/sq. cm. or 0.5 percent by weight (5,000 ppm), or (1) in the case of paint or other surface coatings such lower level as may be established by the Secretary of Housing and Urban Development, as defined by Section 302 (c) of the Lead Based Paint Poisoning Prevention Act, or (2) in the case of any other paint or surface coatings, such other level as may be established by the Administrator of EPA." The Vermont Occupational Safety and Health Administration (VOSHA) does not specify a regulated quantity of lead within paint. Applicable VOSHA regulations address the presence of lead within paint regardless of specific quantity present.

Please note that this document does not provide a comprehensive inventory of components with lead-based paint. This is because protocols do not require testing of every inch of a painted/ stained surface.

Components with the same paint history as those tested may contain lead-based paint within each room or on the building exterior (i.e., under the currently visible paint layer). In addition, protocols do not require testing of more than one item from the same testing component within each room (i.e., if more than one window was present in a room, and if CPAI tested window components from one window and they were positive, then the same window components from the other windows in the room should be assumed to be positive).

All lead-based paint inspection activities were performed by Todd C Hobson. Mr. Hobson is a State of Vermont certified Lead Inspector Technician I (#IT732966). Specific hours of on-site testing are available upon request.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this inspection report, or require additional services, please contact us at (802) 879-2600.

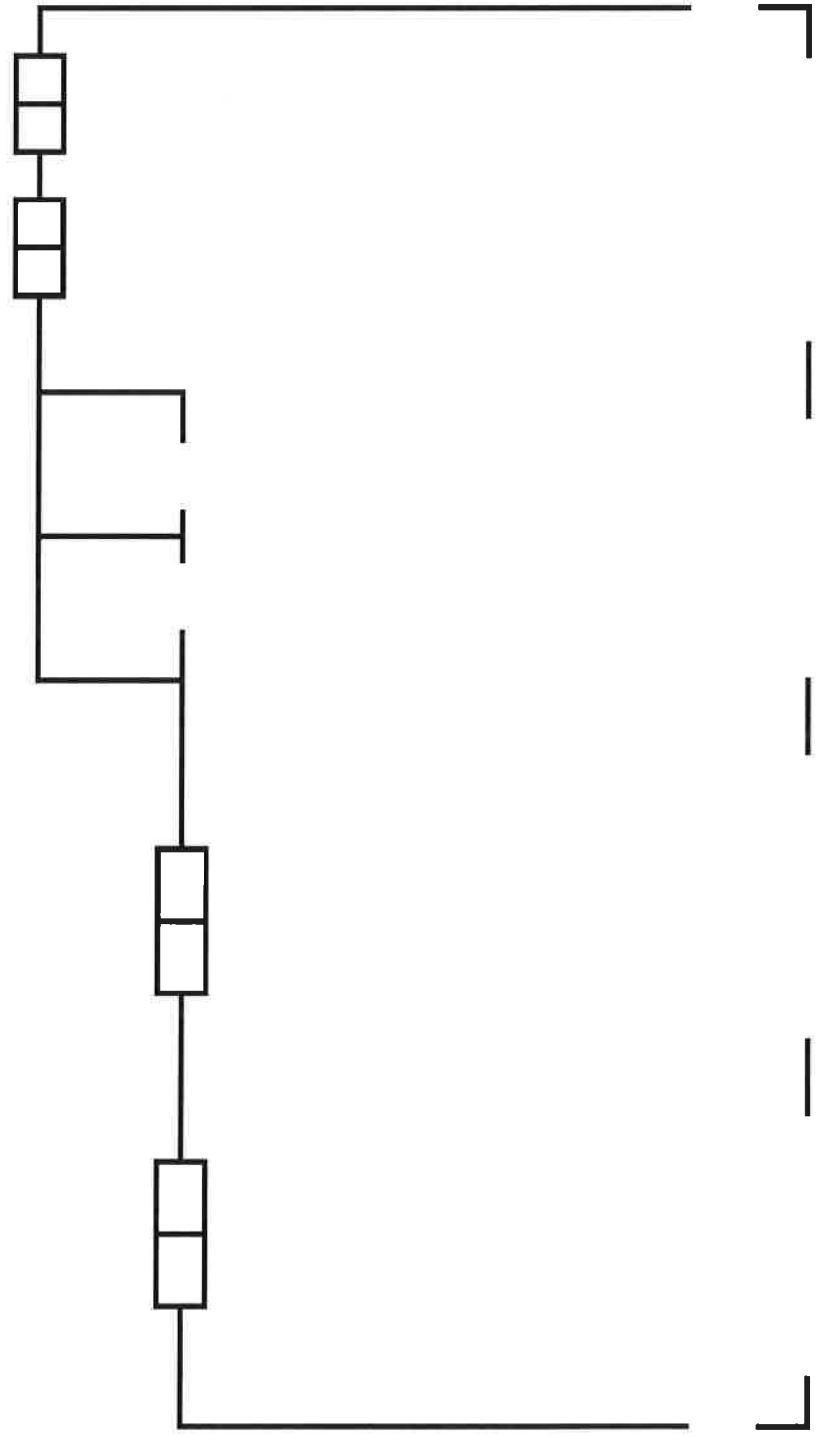
Sincerely,
CLAY POINT ASSOCIATES, INC.



Todd C. Hobson
President

Middlebury Garage

C



Project North

Clay Point Associates, Inc.
Project #15014
July 8, 2019

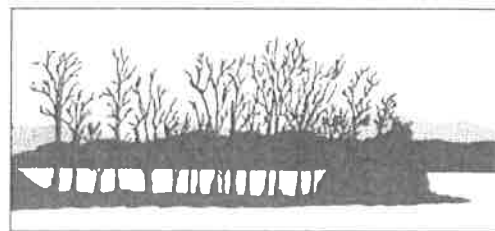
Commercial Structure
1007 US Route 7
Middlebury, Vermont

Lead-Based Paint Inspection
Not to Scale
Drawn by: Todd Hobson

US Rt. 7

Clay Point Associates, Inc.

www.claypointassociates.com



Calibration Check Test Results

ADDRESS: Commercial Structures
1007 US Route 7
Middlebury, Vermont

DATE: 07/08/19
INSPECTOR: Todd C. Hobson
XRF SERIAL NO.: 2471

Start Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
9:32	01	1.1
	02	1.0
	03	1.1
	Average:	1.1

Start Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
9:41	04	- 0.1
	05	- 0.2
	06	- 0.2
	Average:	-0.2

Mid Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
1:15	272	1.1
	273	1.0
	274	1.0
	Average:	1.0

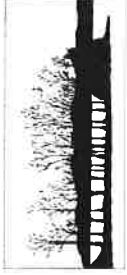
Mid Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
1:26	275	- 0.2
	276	- 0.1
	277	- 0.2
	Average:	- 0.2

End Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
2:52	292	1.0
	293	1.1
	294	1.1
	Average:	1.1

End Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
3:01	295	- 0.2
	296	- 0.2
	297	- 0.2
	Average:	- 0.2

Calibration Check Tolerance Used **1.0 mg./sq. cm.**
XRF Calibration Check Limits: 0.7 mg./sq. cm. to 1.3 mg./sq. cm. (inclusive)

Inspector Signature: _____



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Garage

DATE: July 8, 2019

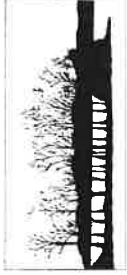
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: Interior

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
260	Door Jamb	White	Wood	Intact	Wall C, Door 1	- 0.3	Neg.
261	Door	Grey	Metal	Deter.	Wall D, Door 1	- 0.2	Neg.
262	Door Casing	Grey	Metal	Deter.	Wall D, Door 1	- 0.3	Neg.
263	Door Jamb	Grey	Metal	Deter.	Wall D, Door 1	- 0.3	Neg.
264	Door Stop	Grey	Metal	Deter.	Wall D, Door 1	- 0.2	Neg.
265	Window Casing	White	Wood	Deter.	Wall C, Window 4	- 0.1	Neg.
266	Window Sash	White	Wood	Deter.	Wall C, Window 4	- 0.0	Neg.

- Ceiling is unpainted, unstained wood.
- Garage doors A-1, A-2, A-3, and A-4 are unpainted fiberglass panels.
- Door B-1 components are the same as Door D-1.
- Door components not tested are unpainted/unstained wood.
- Window C-1, C-2, C-3, C-5, C-6, C-7, and C-8 components are the same as Window C-4.
- Window components not tested are unpainted/unstained.
- Walls are unpainted/unstained wood.
- Floor is unpainted concrete slab.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Garage

DATE: July 8, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: Exterior

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
267	Door	Grey	Metal	Deter.	Wall D, Door 1	- 0.2	Neg.
268	Window Casing	White	Wood	Deter.	Wall C, Window 1	- 0.1	Neg.
269	Window Stop	White	Wood	Deter.	Wall C, Window 1	- 0.2	Neg.
270	Window Apron	White	Wood	Deter.	Wall C, Window 1	- 0.2	Neg.
271	Supp. Column	White	Wood	Deter.	Assoc. w/ garage doors	- 0.1	Neg.

- Garage Doors A-1, A-2, A-3, and A-4 are unpainted fiberglass panels.
- Window C-2, C-3, C-4, C-5, C-6 components are the same as Window C-1.

LEAD CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: LC200999

EXPIRES: Monday, March 23, 2020

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.
THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to be 'C. L.' or similar, is located to the right of the text 'COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.'

LEAD INSPECTOR TECHNICIAN I

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: IT732966

EXPIRES: Wednesday, February 26, 2020

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to read "Vernon", is written over the bottom right portion of the certificate text.



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Universal/Electronic Waste
Middlebury Garage, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional environmental inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 within the Middlebury Administrative Site, Garage, 10097 US Route 7 South, Middlebury, Vermont.

During the inspection, CPAI identified all universal/electronic waste inside the building. This inventory did not include underground storage tanks (USTs), or any other subsurface materials/contamination that may be present at the site.

A Drawing depicting CPAI Area Numbers and the Approximate Inventory of Universal/Electronic Waste (Table 1) are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

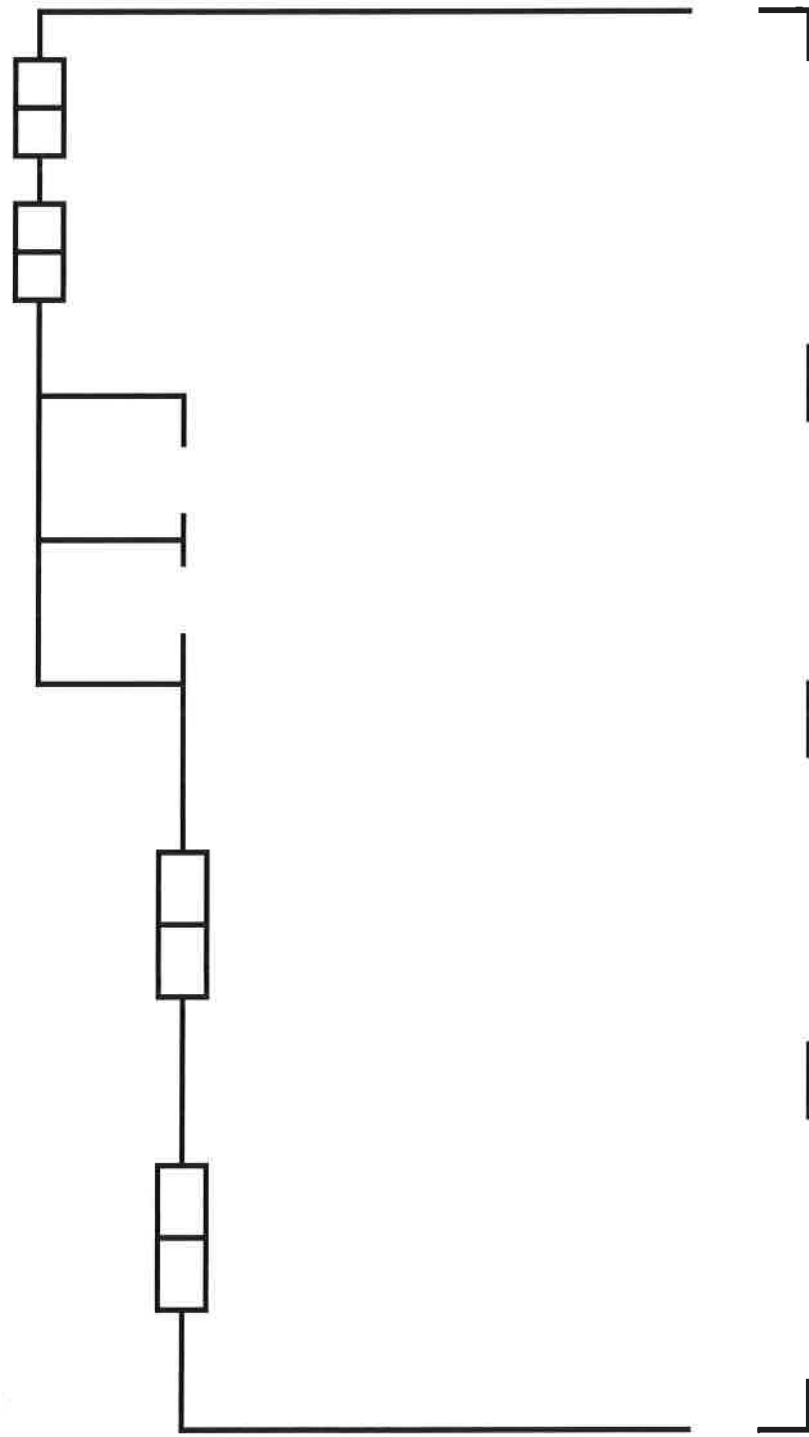
A handwritten signature in dark ink, appearing to read 'Todd C. Hobson', with a long, sweeping horizontal stroke at the end.

Todd C. Hobson
President

Middlebury Garage



Project North



Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury, Vermont

Universal Waste Inspection
Not to Scale
Drawn by: Todd Hobson

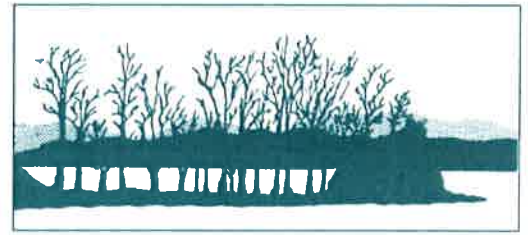


Table 1
Approximate Inventory of Universal Waste

Building/Addition:		USFS/Middlebury Administrative Site Middlebury Garage 1007 US Route 7 South Middlebury, Vermont	
CPAI Area No.	Equipment/Item	Approx. Quantity	General Location
Main Area	Fire Extinguisher	1	On north wall, west section.
	Fluorescent Light Tubes	16	On ceiling throughout area.
	Light Ballasts	8	On ceiling throughout area.

Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Asbestos Containing Materials
Middlebury Office, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional asbestos inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 on/within the Middlebury Administrative Site, Office Building, 1007 US Route 7 South, Middlebury, Vermont. Inspection activities were limited to evaluation of accessible suspect asbestos containing materials.

On July 8, 2019, CPAI collected forty-two (42) bulk samples from suspect asbestos containing materials. All bulk samples were submitted to a Vermont certified analytical service. Thirty-five (35) bulk samples were analyzed by Polarized Light Microscopy (PLM), Visual Estimation Method, according to EPA Method 600/R-93/116. Identification of asbestos by PLM is based on optical crystallographic properties, and gives a qualitative differentiation between types of asbestos and other fibrous materials. It also allows for a quantitative estimate of percent asbestos using EPA approved methods. Seven (7) samples were not analyzed in accordance with our stop positive protocol.

A Drawing depicting existing conditions/ CPAI Area Numbers, The Bulk Sample Analysis Inventory (Table 1), the Inventory of Asbestos Containing Materials (Table 2), analytical service bulk sample analysis report and CPAI/analytical service certification information are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

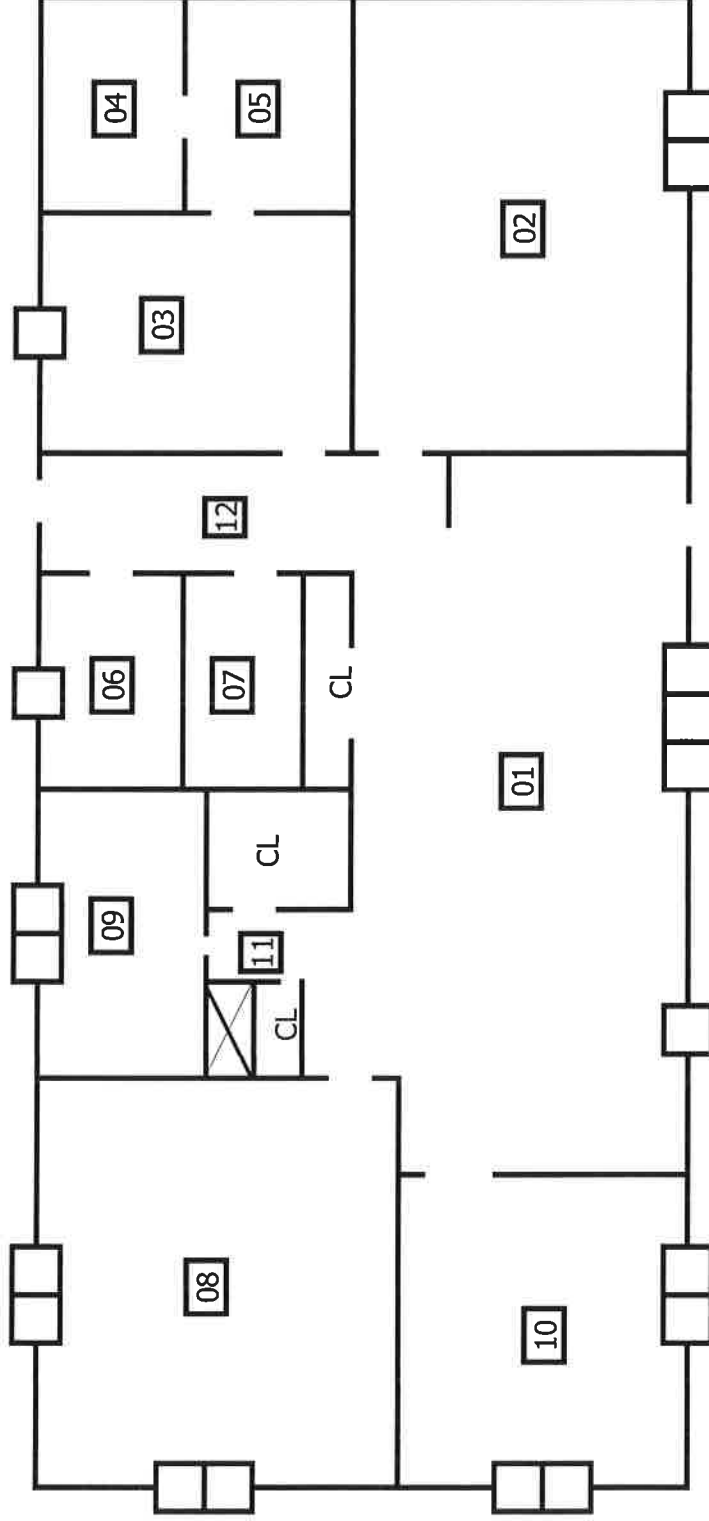
A handwritten signature in dark ink, appearing to read 'Todd C. Hobson', written in a cursive style.

Todd C. Hobson
President

Middlebury Office



Project North



00 = CPAI Area Number

Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury, Vermont

Asbestos Inspection
Not to Scale
Drawn by: Todd Hobson

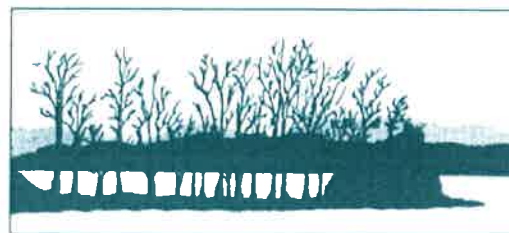


Table 1
Bulk Sample Analysis Inventory

Building/Addition:		USFS/Middlebury Administrative Site Middlebury Office 1007 US Route 7 South Middlebury, Vermont			
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Mudded Material, assoc. w/ boiler exhaust breeching	07081915014-29	07/08/19	1930315-013	CPAI Area #09, on west wall, (east side of chimney), 1 ft. 2 in. from north wall, 5 ft. 11 in. from floor.	NAD
Ceiling Tile, 1' x 1', random worm pattern	07081915014-19	07/08/19	1930315-009	CPAI Area #10, 2 ft. 6 in. from north wall, 2 ft. 7 in. from east wall.	NAD
	07081915014-30	07/08/19	1930315-010	CPAI Area #01, 3 ft. 8 in. from north wall, 8 ft. 9 in. from west wall.	NAD
Ceiling Tile, 1' x 1', random cuts pattern	07081915014-01	07/08/19	1930315-011	CPAI Area #01, 3 ft. 6 in. from south wall, 3 ft. 6 in. from west wall.	NAD
	07081915014-20	07/08/19	1930315-012	CPAI Area #01, 6 ft. 6 in. from south wall, 4 in. from west wall.	NAD

Table 1
Bulk Sample Analysis Inventory

Building/Addition:		USFS/Middlebury Administrative Site Middlebury Office 1007 US Route 7 South Middlebury, Vermont			
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Gypsum Wallboard (Sheet Rock)	07081915014-23	07/08/19	1930315-006	CPAI Area #09, on ceiling, 10 in. from south wall, 4 in. from westernmost wall.	NAD
	07081915014-13	07/08/19	1930315-007	CPAI Area #04, on east wall, 3 ft. 7 in. from south wall, 5 ft. 4 in. from floor.	NAD
	07081915014-07	07/08/19	1930315-008	CPAI Area #08, on ceiling, 3 ft. 1 in. from east wall, 2 in. from north wall.	NAD
Joint Compound assoc. w/ Gypsum Wallboard (Sheet Rock)	07081915014-15	07/08/19	1930315-001	CPAI Area #03, on ceiling, 2 ft. 4 in. from south wall, 8 ft. from east wall.	3% Chrys.
	07081915014-21	07/08/19	1930315-002	CPAI Area #02, on ceiling, 3 ft. 4 in. from south wall, 5 ft. 5 in. from east wall.	3% Chrys.
	07081915014-27	07/08/19	1930315-003	CPAI Area #06, on east wall, 1 in. from north wall, 4 ft. 3 in. from floor.	3% Chrys.
	07081915014-25	07/08/19	1930315-004	CPAI Area #08, on ceiling, 7 ft. 3 in. from north wall, 2 ft. 8 in. from west wall.	3% Chrys.
	07081915014-14	07/08/19	1930315-005	CPAI Area #09, on west wall, 2 ft. from north wall, 2 ft. 8 in. from west wall.	3% Chrys.

Table 1
Bulk Sample Analysis Inventory

Building/Addition: USFS/Middlebury Administrative Site
Middlebury Office
1007 US Route 7 South
Middlebury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Covebase, 4", brown	07081915014-11	07/08/19	1930315-033	CPAI Area #09, on west wall, 2 ft. from south wall, 4 in. from floor.	NAD
	07081915014-04	07/08/19	1930315-034	CPAI Area #09, on west wall, 1 ft. 10 in. from south wall, 4 in. from floor.	NAD
Adhesive assoc. w/ Covebase, 4", brown	07081915014-11A	07/08/19	1930315-035	CPAI Area #09, on west wall, 2 ft. from south wall, 4 in. from floor.	NAD
	07081915014-04A	07/08/19	1930315-036	CPAI Area #09, on west wall, 1 ft. 10 in. from south wall, 4 in. from floor.	NAD
Linoleum Floor Covering, shades of beige, large stone pattern	07081915014-10	07/08/19	1930315-037	CPAI Area #07, 1 in. from south wall, 4 in. from east wall.	NAD
	07081915014-02	07/08/19	1930315-038	CPAI Area #06, 1 in. from south wall, 2 ft. 8 in. from west wall.	NAD
Adhesive, assoc. w/ Linoleum Floor Covering, shades of beige, large stone pattern	07081915014-02A	07/08/19	1930315-040	CPAI Area #06, 1 in. from south wall, 2 ft. 8 in. from west wall.	NAD
	07081915014-10A	07/08/19	1930315-039	CPAI Area #07, 1 in. from south wall, 4 in. from east wall.	NAD

Table 1
Bulk Sample Analysis Inventory

Building/Addition:		USFS/Middlebury Administrative Site Middlebury Office 1007 US Route 7 South Middlebury, Vermont			
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Vinyl Floor Tile, brown, unknown size and pattern	07081915014-05	07/08/19	1930315-016	CPAI Area #04, 4 in. from south wall, 1 ft. 7 in. from east wall (under carpet).	3% Chrys.
	07081915014-06	07/08/19	1930315-017	CPAI Area #01, 7 ft. 4 in. from north wall, 4 in. from west wall, (under carpet).	n/a
	07081915014-28	07/08/19	1930315-018	CPAI Area #11 Closet, 6 in. from north wall, 2 in. from west wall, (under carpet).	n/a
Adhesive assoc. w/ Vinyl Tile, brown, unknown size and pattern	07081915014-05A	07/08/19	1930315-019	CPAI Area #04, 4 in. from south wall, 1 ft. 7 in. from east wall (under carpet).	2% Chrys.
	07081915014-06A	07/08/19	1930315-020	CPAI Area #01, 7 ft. 4 in. from north wall, 4 in. from west wall (under carpet).	n/a
	07081915014-28A	07/08/19	1930315-021	CPAI Area #11 Closet, 6 in. from north wall, 2 in. from west wall (under carpet).	n/a
Vinyl Floor Tile, 9" x 9", brown	07081915014-16	07/08/19	1930315-029	CPAI Area #09, 1 ft. 7 in. from west wall, 2 ft. from south wall.	5% Chrys.
	07081915014-24	07/08/19	1930315-030	CPAI Area #09, 1 ft. 5 in. from south wall, 3 ft. 2 in. from west wall.	n/a

Table 1
Bulk Sample Analysis Inventory

Building/Addition: USFS/Middlebury Administrative Site Middlebury Office 1007 US Route 7 South Middlebury, Vermont					
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Adhesive, black, assoc. w/ Vinyl Floor Tile, 9" x 9", brown	07081915014-16A	07/08/19	1930315-031	CPAI Area #09, 1 ft. 7 in. from west wall, 2 ft. from south wall.	3% Chrys.
	07081915014-24A	07/08/19	1930315-032	CPAI Area #09, 1 ft. 5 in. from south wall, 3 ft. 2 in. from west wall.	n/a
Vinyl Floor Tile, 12" x 12", shades of beige, mottled	07081915014-03	07/08/19	1930315-025	CPAI Area #09, 6 ft. 7 in. from north wall, 1 ft. 9 in. from west wall.	NAD
	07081915014-17	07/08/19	1930315-026	CPAI Area #09, 6 ft. 8 in. from north wall, 1 ft. 10 in. from west wall.	NAD
Adhesive, tan, assoc. w/ Vinyl Floor Tile, 12" x 12", shades of beige, mottled	07081915014-03A	07/08/19	1930315-027	CPAI Area #09, 6 ft. 7 in. from north wall, 1 ft. 9 in. from west wall.	3% Chrys.
	07081915014-17A	07/08/19	1930315-028	CPAI Area #09, 6 ft. 8 in. from north wall, 1 ft. 10 in. from west wall.	n/a
Carpet Adhesive, tan	07081915014-05B	07/08/19	1930315-022	CPAI Area #04, 4 in. from south wall, 1 ft. 7 in. from east wall (under carpet).	NAD
	07081915014-06B	07/08/19	1930315-023	CPAI Area #01, 7 ft. 4 in. from north wall, 4 in. from west wall (under carpet).	NAD
	07081915014-28B	07/08/19	1930315-024	CPAI Area #11 Closet, 6 in. from north wall, 2 in. from west wall (under carpet).	NAD

Table 1
Bulk Sample Analysis Inventory

Building/Addition:	USFS/Middlebury Administrative Site Middlebury Office 1007 US Route 7 South Middlebury, Vermont
--------------------	--

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Mortar assoc. w/ concrete block (cmu)	07081915014-18	07/08/19	1930315-014	Exterior, North Elevation, near west corner, near ground.	NAD
	07081915014-26	07/08/19	1930315-015	Exterior, South Elevation, near west corner, near ground.	NAD
Concrete	07081915014-22	07/08/19	1930315-041	Exterior, East Elevation, from north edge of poured threshold of door to CPAI Area #12.	NAD
	07081915014-08	07/08/19	1930315-042	Exterior, West Elevation, from southwest corner of poured pad at door to CPAI Area #01.	NAD

PLM = Polarized Light Microscopy
NAD = No Asbestos Detected
Chrys. = Chrysotile Asbestos
n/a = sample not analyzed (stop at first positive result in group)

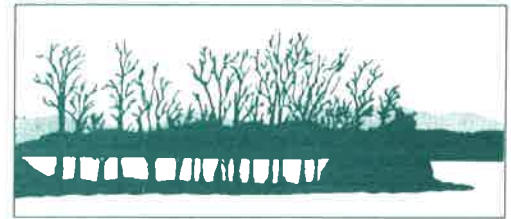


Table 2
Inventory of Asbestos Containing Materials

Location:		USFS/Middlebury Administrative Site Middlebury Office 1007 US Route 7 South Middlebury, Vermont	
CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
01 & Closet	Joint Compound, associated with gypsum wallboard (sheet rock)	539 sq. ft.	On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	562 sq. ft.	On entire floor (under carpeting).
02	Joint Compound, associated with gypsum wallboard (sheet rock)	706 sq. ft.	On entire ceiling. On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	251 sq. ft.	On entire floor (under carpeting).
03	Joint Compound, associated with gypsum wallboard (sheet rock)	425 sq. ft.	On entire ceiling. On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	117 sq. ft.	On entire floor (under carpeting).
04	Joint Compound, associated with gypsum wallboard (sheet rock)	277 sq. ft.	On entire ceiling. On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	54 sq. ft.	On entire floor (under carpeting).
05	Joint Compound, associated with gypsum wallboard (sheet rock)	285 sq. ft.	On entire ceiling. On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	63 sq. ft.	On entire floor (under carpeting).

Table 2
Inventory of Asbestos Containing Materials

Location:		USFS/Middlebury Administrative Site Middlebury Office 1007 US Route 7 South Middlebury, Vermont	
CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
06	Joint Compound, associated with gypsum wallboard (sheet rock)	267 sq. ft.	On entire ceiling. On all walls.
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	54 sq. ft.	On entire floor (under non-asbestos linoleum floor covering).
07	Joint Compound, associated with gypsum wallboard (sheet rock)	199 sq. ft.	On entire ceiling. On all walls.
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	41 sq. ft.	On entire floor (under non-asbestos linoleum floor covering).
08	Joint Compound, associated with gypsum wallboard (sheet rock)	710 sq. ft.	On entire ceiling. On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	255 sq. ft.	On entire floor (under carpeting).
09	Joint Compound, associated with gypsum wallboard (sheet rock)	334 sq. ft.	On entire ceiling. On all walls.
	Vinyl Floor Tile, 9" x 9", brown, and Adhesive	33 sq. ft.	On entire floor, excluding north section.
	Residual Floor Tile Adhesive	42 sq. ft.	On floor in north section (under non-asbestos vinyl floor tile).
10	Joint Compound, associated with gypsum wallboard (sheet rock)	343 sq. ft.	On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	156 sq. ft.	On entire floor (under carpeting).
11	Joint Compound, associated with gypsum wallboard (sheet rock)	93 sq. ft.	On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	40 sq. ft.	On entire floor (under carpeting).

Table 2
Inventory of Asbestos Containing Materials

Location: USFS/Middlebury Administrative Site
Middlebury Office
1007 US Route 7 South
Middlebury, Vermont

CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
11 South Closet	Joint Compound, associated with gypsum wallboard (sheet rock)	191 sq. ft.	On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	40 sq. ft.	On entire floor (under carpeting).
11 North Closet	Joint Compound, associated with gypsum wallboard (sheet rock)	79 sq. ft.	On entire ceiling. On all walls.
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	9 sq. ft.	On entire floor (under carpeting).
12	Joint Compound, associated with gypsum wallboard (sheet rock)	196 sq. ft.	On all walls (behind wall paneling).
	Vinyl Floor Tile, brown, unknown size and pattern, and Adhesive	70 sq. ft.	On entire floor (under carpeting).



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston VT 05495

Project Reference: 15014-Batch #1
Laboratory Batch #: 1930315
Date Samples Received: 07/09/2019
Date Samples Analyzed: 07/18/2019
Date of Final Report: 07/18/2019

SAMPLE IDENTIFICATION:

Forty Two (42) samples from CPAI Project #: 15014 - Batch #1 project were submitted by Todd Hobson on 07/09/2019

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-600/M4-82-020, EPA-600/ R-93-116). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter ($<0.25\mu\text{m}$) may not be detected by the PLM method. Floor tile and other resinously bound material may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additional analytical methods may be required. Optimum recommends using Transmission Electron Microscopy (TEM) for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

Use of the NVLAP and AIHA Logo in no way constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit $<1\%$, Reporting Limits: CVES = 1% , 400 Point Count = $.25\%$, 1000 Point Count = 0.1% ; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director

Kristina Scaviola
Laboratory Supervisor



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #1

ORDER #: 1930315
PROJECT #: 15014-Batch #1
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/18/2019
REPORT DATE: 07/18/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
1930315-001 07081915014.15	Bulk Material, Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
Total % Asbestos:				3.0%	Total % Non-Asbestos: 97.0%	
1930315-002 07081915014.21	Bulk Material, Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
Total % Asbestos:				3.0%	Total % Non-Asbestos: 97.0%	
1930315-003 07081915014.27	Bulk Material, Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
Total % Asbestos:				3.0%	Total % Non-Asbestos: 97.0%	
1930315-004 07081915014.25	Bulk Material, Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
Total % Asbestos:				3.0%	Total % Non-Asbestos: 97.0%	
1930315-005 07081915014.14	Bulk Material, Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
Total % Asbestos:				3.0%	Total % Non-Asbestos: 97.0%	
1930315-006 07081915014.23	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	10% 90%
Total % Asbestos:				No Asbestos Detected	Total % Non-Asbestos: 100.0%	
1930315-007 07081915014.13	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	10% 90%
Total % Asbestos:				No Asbestos Detected	Total % Non-Asbestos: 100.0%	
1930315-008 07081915014.07	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	10% 90%
Total % Asbestos:				No Asbestos Detected	Total % Non-Asbestos: 100.0%	



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #1

ORDER #: 1930315
PROJECT #: 15014-Batch #1
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/18/2019
REPORT DATE: 07/18/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
1930315-009 07081915014.19	Bulk Material, White/Gray	LAYER 1 100%	None Detected	Cellulose Fiber 2% Fibrous Glass 55% Mineral Wool 20% Binder/Filler 23%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-010 07081915014.30	Bulk Material, White/Gray	LAYER 1 100%	None Detected	Cellulose Fiber 2% Fibrous Glass 55% Mineral Wool 20% Binder/Filler 23%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-011 07081915014.01	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 10% Binder/Filler 25%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-012 07081915014.20	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 10% Binder/Filler 25%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-013 07081915014.29	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-014 07081915014.18	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-015 07081915014.26	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #1

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930315
PROJECT #: 15014-Batch #1
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/18/2019
REPORT DATE: 07/18/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
1930315-016 07081915014.05	Floor Tile, Brown	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
Total % Asbestos:				3.0%	Total % Non-Asbestos: 97.0%	
1930315-017 07081915014.06	Floor Tile, Brown Note: Positive Stop	LAYER 1 100%				
1930315-018 07081915014.28	Floor Tile, Brown Note: Positive Stop	LAYER 1 100%				
1930315-019 07081915014.05A	Adhesive, Black	LAYER 1 100%	Chrysotile	2%	Cellulose Fiber Binder/Filler	1% 97%
Total % Asbestos:				2.0%	Total % Non-Asbestos: 98.0%	
1930315-020 07081915014.06A	Adhesive, Black Note: Positive Stop	LAYER 1 100%				
1930315-021 07081915014.28A	Adhesive, Black Note: Positive Stop	LAYER 1 100%				
1930315-022 07081915014.05B	Adhesive, Tan	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
Total % Asbestos:				No Asbestos Detected	Total % Non-Asbestos: 100.0%	
1930315-023 07081915014.06B	Adhesive, Tan	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
Total % Asbestos:				No Asbestos Detected	Total % Non-Asbestos: 100.0%	
1930315-024 07081915014.28B	Adhesive, Tan	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
Total % Asbestos:				No Asbestos Detected	Total % Non-Asbestos: 100.0%	



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #1

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930315
PROJECT #: 15014-Batch #1
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/18/2019
REPORT DATE: 07/18/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
1930315-025 07081915014.03	Floor Tile, White	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
Total % Asbestos:			No Asbestos Detected		Total % Non-Asbestos: 100.0%	
1930315-026 07081915014.17	Floor Tile, White	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
Total % Asbestos:			No Asbestos Detected		Total % Non-Asbestos: 100.0%	
1930315-027 07081915014.03A	Adhesive, Black	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
Total % Asbestos:			3.0%		Total % Non-Asbestos: 97.0%	
1930315-028 07081915014.17A	Adhesive, Black Note: Positive Stop	LAYER 1 100%				
1930315-029 07081915014.16	Tile, Brown	LAYER 1 100%	Chrysotile	5%	Cellulose Fiber Binder/Filler	1% 94%
Total % Asbestos:			5.0%		Total % Non-Asbestos: 95.0%	
1930315-030 07081915014.24	Tile, Brown Note: Positive Stop	LAYER 1 100%				
1930315-031 07081915014.16A	Adhesive, Black	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
Total % Asbestos:			3.0%		Total % Non-Asbestos: 97.0%	
1930315-032 07081915014.24A	Adhesive, Black Note: Positive Stop	LAYER 1 100%				



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #1

ORDER #: 1930315
PROJECT #: 15014-Batch #1
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/18/2019
REPORT DATE: 07/18/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
1930315-033 07081915014.11	Covebase, Brown	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-034 07081915014.04	Covebase, Brown	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-035 07081915014.11A	Adhesive, Tan	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-036 07081915014.04A	Adhesive, Tan	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-037 07081915014.10	Linoleum, White/Gray	LAYER 1 100%	None Detected	Cellulose Fiber 65% Binder/Filler 35%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-038 07081915014.02	Linoleum, White/Gray	LAYER 1 100%	None Detected	Cellulose Fiber 65% Binder/Filler 35%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-039 07081915014.10A	Adhesive, Tan	LAYER 1 100%	None Detected	Cellulose Fiber 2% Binder/Filler 98%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-040 07081915014.02A	Adhesive, Tan	LAYER 1 100%	None Detected	Cellulose Fiber 2% Binder/Filler 98%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #1

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930315
PROJECT #: 15014-Batch #1
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/18/2019
REPORT DATE: 07/18/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
1930315-041 07081915014.22	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930315-042 07081915014.08	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%

**Analyst
Signatory:**
Jamie Noel

NVLAP
Lab Code: 101433-0



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
 ADDRESS: P.O. Box 1254
 CITY / STATE / ZIP: Williston VT 05495
 CONTACT: Todd Hobson
 DESCRIPTION: PLM Analysis
 LOCATION: CPAI Project #: 15014 - Batch #1

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930315
 PROJECT #: 15014-Batch #1
 DATE COLLECTED: 07/08/2019
 COLLECTED BY: Todd Hobson
 DATE RECEIVED: 07/09/2019
 ANALYSIS DATE: 07/18/2019
 REPORT DATE: 07/18/2019
 ANALYST: Jamie Noel

1930315



Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

CPAI Proj #

15014

Type					Sample Number(s)
Asby	Gravel	Air	Bank	ICE	
X			X		CPAI 15014-01-30 except 09,12

	Date	Time	Name	Signature
Transfer #1	07.08.19	18:52	Todd Hobson	
to:		Sent to	Optimum by FedEx	
Transfer #2	7/9/19	12 ⁵⁰	Holly Moeris	
to:				
Transfer #3				
to:				

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #1

ORDER #: 1930315
PROJECT #: 15014-Batch #1
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/18/2019
REPORT DATE: 07/18/2019
ANALYST: Jamie Noel

1930315

Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 08 July 2019 CPAI Proj. #: 15014

Analytical Service: Optimum

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
07081915014.15	07.08.19	PLM	1	Analyze PLM
21			2	
22			3	
25			4	
14			5	
23			6	
13			7	
07			8	
19			9	
30			10	
01			11	
20			12	
29			13	
18			14	
26	↓	↓	15	↓

Chain of Custody Form Attached?

☒ Yes ☐ No

Consultant Signature: _____

Page No.: 1 of 3

Optimum 7/19/19 12:50

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #1

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930315
PROJECT #: 15014-Batch #1
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/18/2019
REPORT DATE: 07/18/2019
ANALYST: Jamie Noel

1930315

Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 08 July 2019 CPAI Proj. #: 15014

Analytical Service: Optimum

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions	
07081915014-05	07.08.19	PLM	16	Stop Positive	
06			16	↓	Tile
28			16	↓	
05A			17	Stop Positive	
06A			17	↓	Adhesive, black
28A			17	↓	
05B			18	Stop Positive	
06B			18	↓	Adhesive, tan
28B			18	↓	
03			19	Stop Positive	
17			19	↓	Tile
03A			20	Stop Positive	
17A			20	↓	Adhesive
16			21	Stop Positive	
24	↓	↓	21	↓	Tile

Chain of Custody Form Attached? ☒ Yes ☐ No

Consultant Signature: [Signature] Page No.: 2 of 3

7/19/19 50

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #1

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930315
PROJECT #: 15014-Batch #1
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/18/2019
REPORT DATE: 07/18/2019
ANALYST: Jamie Noel

1930315

Clay Point Associates, Inc.

5 day
turnaround

BULK SAMPLE ANALYSIS REQUEST FORM

Batch 1

Date of Submission: 08 July 2019 CPAI Proj. #: 15014

Analytical Service: Optimum

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions	
07081915014-16A	07.08.19	PLM	22	Stop Positive	Adhesive
24A	↓	↓	22	↓	
11	↓	↓	23	Stop Positive	Coverboard
04	↓	↓	23	↓	
11A	↓	↓	24	Stop Positive	Adhesive
04A	↓	↓	24	↓	
10	↓	↓	25	Stop Positive	Limestone
02	↓	↓	25	↓	
10A	↓	↓	26	Stop Positive	Adhesive
02A	↓	↓	26	↓	
22	↓	↓	27	Analyze PLM	
08	↓	↓	28	↓	

Chain of Custody Form Attached?

Yes No

Consultant Signature:

Page No: 3 of 3

7/17/19 12:50

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600

ASBESTOS CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: CE998564

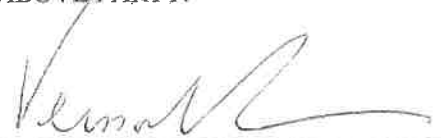
EXPIRES: Monday, April 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to be "Vernon", is written over the bottom right portion of the certificate text.

ASBESTOS INSPECTOR/MANAGEMENT PLANNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: MP262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT DESIGNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PD262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT MONITOR

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PM262143

EXPIRES: Sunday, March 01, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS ANALYTICAL SERVICES

OPTIMUM ANALYTICAL AND CONSULTING, LLC
85 STILES ROAD, STE. 201
SALEM, NH 03078

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: AL143503

EXPIRES: Wednesday, June 17, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.
COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

AIR ANALYSIS BY PCM

BULK ANALYSIS BY PLM

A handwritten signature in dark ink, appearing to be 'PLM', is located to the right of the 'BULK ANALYSIS BY PLM' text.

ASBESTOS PCM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PA307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PLM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PB307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos Pcm Analyst
Not a Legal Form of ID

JAMIE L. NOEL

Eff. Date 02/11/19
Exp. Date 02/11/20

CONES
PA307779



Renewal



VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos Plm Analyst
Not a Legal Form of ID

JAMIE L. NOEL

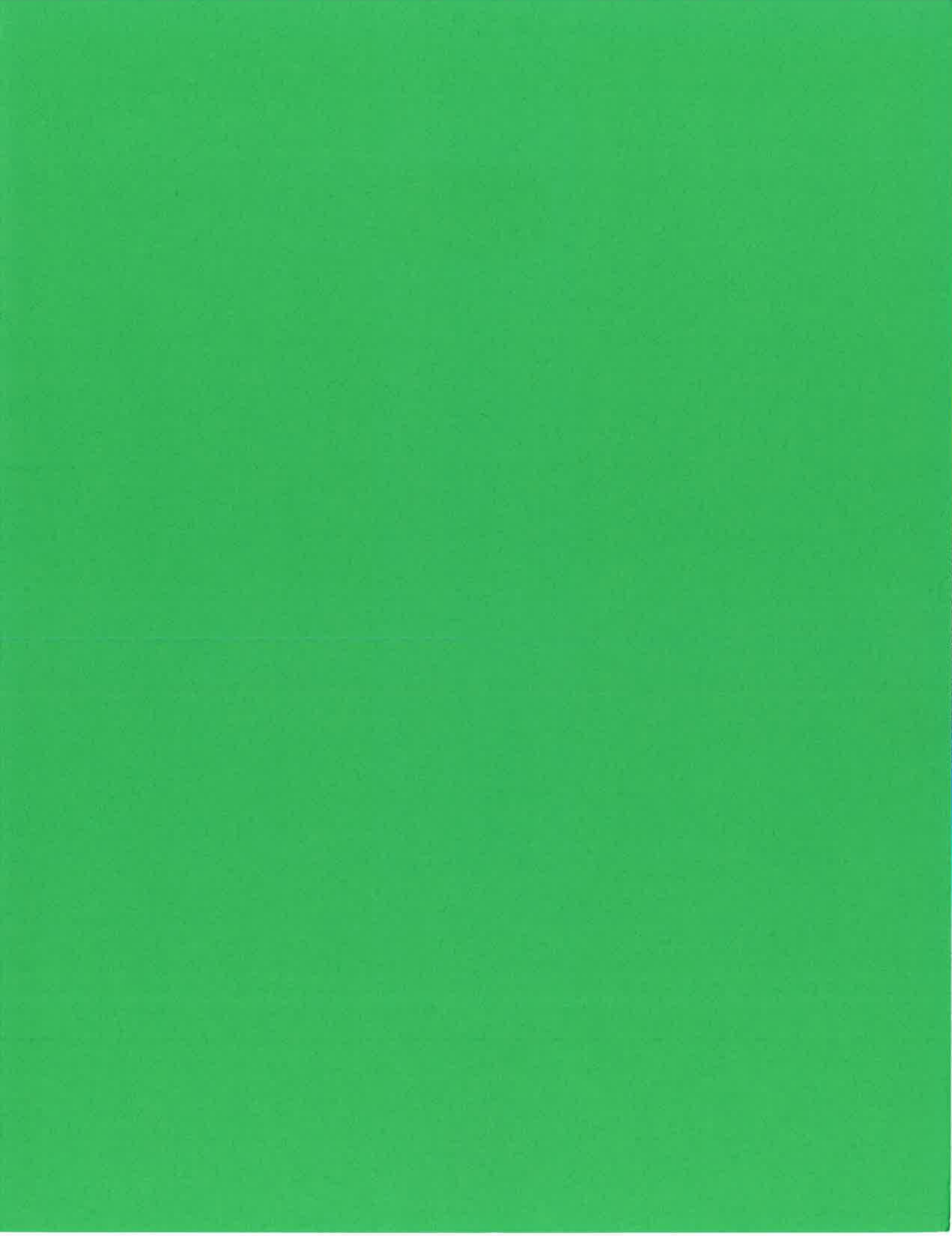
Eff. Date 02/11/19
Exp. Date 02/11/20

CONES
PB307779



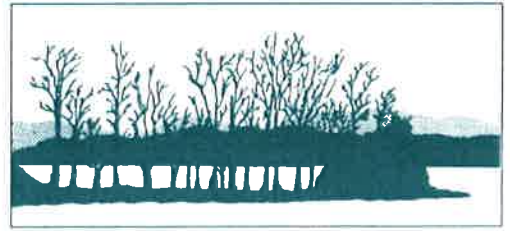
Renewal





Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Report of Lead-Based Paint Inspection
Middlebury Office, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed for your review is the Clay Point Associates, Inc. (CPAI) report related to the lead-based paint inspection performed on July 8, 2019 on/within the Middlebury Administrative Site, Office Building, 1007 US Route 7 South, Middlebury Vermont. The inspection was performed in accordance with the guidelines outlined in Chapter 7: Lead-Based Paint Inspection of the U.S. Department of Housing and Urban Development's, "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing", July 2012 revision (HUD).

For your information, no lead-based paint was detected on/within the structure.

On-site testing was performed by use of a portable x-ray fluorescence analyzer (XRF). Specifically, a Viken Detection Pb200i Handheld XRF Lead Paint Analyzer, serial number #2074, was used by CPAI to inspect all accessible painted/stained surfaces. The XRF calibration was checked according to the manufacturer's recommendations and the guidelines outlined in the December 1, 2006, Performance Characteristic Sheet (PCS) for the above referenced instrument. In addition, precautionary measures were taken to ensure that building occupants, inspectors, and escorts were not inadvertently exposed to radiation as a result of testing.

Attached are copies of the "Lead-Based Paint Testing Data Sheets" generated during the inspection. The sheets reference locations in each room/area where representative XRF testing was performed. Walls in each room/area were assigned an A, B, C or D letter notation. The A Wall in each room/area is always at the street side of the building (US Route 7 South). Notations then proceed clockwise from the A wall to the B, C and D walls. If more than one door or window is on one particular wall, the #1 door/ window is always on the inspector's left as s/he faces the wall. Notations then proceed left to right from 1, to 2, to 3, etc. Also attached please find "Lead Survey Building Sketches" which provide room/area numbers and descriptions of each room's use (i.e. Kitchens, Bathrooms, Bedrooms, etc.).

Mr. David Donahue
October 16, 2019
Page 2

XRF readings are classified into two categories: positive (lead-based paint) and negative (not defined as lead-based paint). The appropriate category is noted in the far right column on the Lead-Based Paint Testing Data Sheets. The Vermont Regulations For Lead Control, V.S.A. Title 18, Chapter 38, Effective October 2, 1994, amended May 1, 2001, defines Lead-Based Paint in target housing and daycare facilities as "paint or other surface coatings that contain lead in excess of 1.0 mg/sq. cm. or 0.5 percent by weight (5,000 ppm), or (1) in the case of paint or other surface coatings such lower level as may be established by the Secretary of Housing and Urban Development, as defined by Section 302 (c) of the Lead Based Paint Poisoning Prevention Act, or (2) in the case of any other paint or surface coatings, such other level as may be established by the Administrator of EPA." The Vermont Occupational Safety and Health Administration (VOSHA) does not specify a regulated quantity of lead within paint. Applicable VOSHA regulations address the presence of lead within paint regardless of specific quantity present.

Please note that this document does not provide a comprehensive inventory of components with lead-based paint. This is because protocols do not require testing of every inch of a painted/ stained surface.

Components with the same paint history as those tested may contain lead-based paint within each room or on the building exterior (i.e., under the currently visible paint layer). In addition, protocols do not require testing of more than one item from the same testing component within each room (i.e., if more than one window was present in a room, and if CPAI tested window components from one window and they were positive, then the same window components from the other windows in the room should be assumed to be positive).

All lead-based paint inspection activities were performed by Todd C Hobson. Mr. Hobson is a State of Vermont certified Lead Inspector Technician I (#IT732966). Specific hours of on-site testing are available upon request.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this inspection report, or require additional services, please contact us at (802) 879-2600.

Sincerely,
CLAY POINT ASSOCIATES, INC.



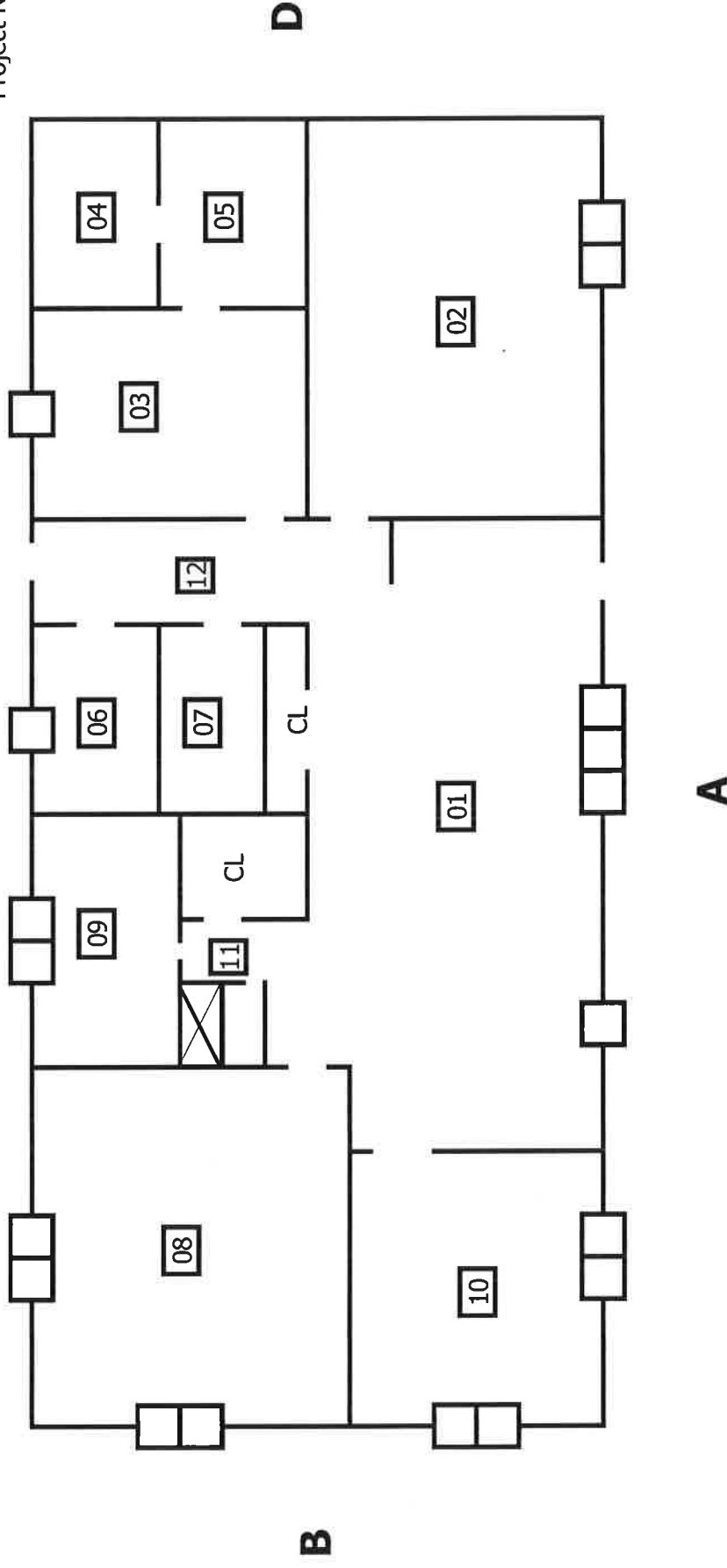
Todd C. Hobson
President

Middlebury Office

C



Project North

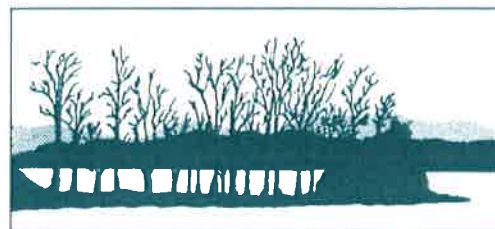


US Rt. 7

Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury, Vermont

Lead-Based Paint Inspection
Not to Scale
Drawn by: Todd Hobson



Calibration Check Test Results

ADDRESS: Commercial Structures
1007 US Route 7
Middlebury, Vermont

DATE: 07/08/19
INSPECTOR: Todd C. Hobson
XRF SERIAL NO.: 2471

Start Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
9:32	01	1.1
	02	1.0
	03	1.1
	Average:	1.1

Start Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
9:41	04	- 0.1
	05	- 0.2
	06	- 0.2
	Average:	-0.2

Mid Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
1:15	272	1.1
	273	1.0
	274	1.0
	Average:	1.0

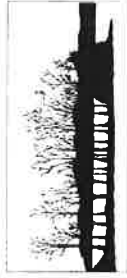
Mid Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
1:26	275	- 0.2
	276	- 0.1
	277	- 0.2
	Average:	- 0.2

End Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
2:52	292	1.0
	293	1.1
	294	1.1
	Average:	1.1

End Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
3:01	295	- 0.2
	296	- 0.2
	297	- 0.2
	Average:	- 0.2

Calibration Check Tolerance Used **1.0 mg./sq. cm.**
XRF Calibration Check Limits: 0.7 mg./sq. cm. to 1.3 mg./sq. cm. (inclusive)

Inspector Signature: _____



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

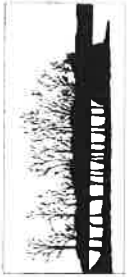
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 01

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
07	Door	Grey	Metal	Intact	Wall A, Door 1	- 0.6	Neg.
08	Door Jamb	White	Wood	Intact	Wall A, Door 1	- 0.2	Neg.
09	Door Casing	Stained	Wood	Intact	Wall A, Door 1	- 0.3	Neg.
10	Door Stop	White	Wood	Intact	Wall A, Door 1	- 0.1	Neg.
11	Sash	White	Wood	Intact	Window assoc. w/ Wall A, Door 1	- 0.4	Neg.
12	Door	Stained	Wood	Intact	Wall C, Door 1	- 0.4	Neg.
13	Door	Stained	Wood	Intact	Wall B, Door 2	- 0.2	Neg.
14	Door Casing	Stained	Wood	Intact	Wall B, Door 2	- 0.1	Neg.
15	Door Jamb	Stained	Wood	Intact	Wall B, Door 2	- 0.1	Neg.
16	Door Stop	Stained	Wood	Intact	Wall B, Door 2	- 0.2	Neg.
17	Window Casing	Stained	Wood	Intact	Wall A, Window 1	- 0.2	Neg.
18	Window Jamb	Stained	Wood	Intact	Wall A, Window 1	- 0.3	Neg.
19	Window Sash	Stained	Wood	Intact	Wall A, Window 1	0.1	Neg.
20	Shelf	Stained	Wood	Intact	Closet	- 0.2	Neg.
21	Shelf Support	Stained	Wood	Intact	Closet	- 0.1	Neg.
22	Radiator	Tan	Metal	Intact	Wall A	- 0.2	Neg.
23	Wall	Brown	Paneling	Intact	Wall A	- 0.1	Neg.
24	Baseboard	Stained	Wood	Intact	Wall D	0.0	Neg.

LEAD BASED PAINT TESTING DATA SHEET



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

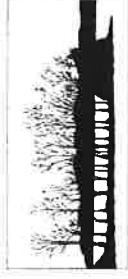
DATE: July 08, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 01

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
<div><ul style="list-style-type: none">- Doors B-1 and D-2 components are the same as Door B-2.- Door C-2 components are the same as Door C-1.- Windows A-2, A-3 and A-4 components are the same as Window A-1; components not tested are unpainted vinyl.- Walls B, C, and D are the same as Wall A.- Floor is carpet.</div>							



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

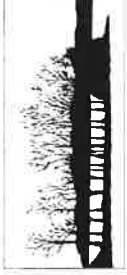
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 02

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
25	Ceiling	White	Sheet Rock	Deter.		- 0.5	Neg.
26	Door	Stained	Wood	Intact	Wall B, Door 1	- 0.2	Neg.
27	Door Casing	Stained	Wood	Intact	Wall B, Door 1	0.1	Neg.
28	Door Jamb	Stained	Wood	Intact	Wall B, Door 1	0.1	Neg.
29	Door Stop	Stained	Wood	Intact	Wall B, Door 1	0.2	Neg.
30	Window Sill	Stained	Wood	Intact	Wall A, Window 1	- 0.2	Neg.
31	Window Casing	Stained	Wood	Intact	Wall A, Window 1	- 0.1	Neg.
32	Window Jamb	Stained	Wood	Intact	Wall A, Window 1	- 0.2	Neg.
33	Radiator	Tan	Metal	Deter.	Wall A	- 0.2	Neg.
34	Trim	Tan	Metal	Deter.	Assoc. w/ Radiator	0.2	Neg.
35	Wall	Brown	Paneling	Intact	Wall C	- 0.7	Neg.
36	Wall	Brown	Paneling	Intact	Wall D	- 0.4	Neg.
37	Baseboard	Stained	Wood	Intact	Wall A	- 0.2	Neg.

- Windows A-2, D-1, and D-2 components are the same as Window A-1; components not tested are unpainted vinyl.
- Wall A is the same as Wall C.
- Wall B is the same as Wall D
- Floor is carpet.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

XRF SERIAL NO.: 2471

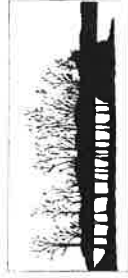
ROOM EQUIVALENT: 03

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
38	Ceiling	White	Sheet Rock	Deter.		- 0.5	Neg.
39	Crown Molding	Stained	Wood	Intact	Wall D	- 0.2	Neg.
40	Door	Stained	Wood	Intact	Wall B, Door 1	- 0.4	Neg.
41	Door Casing	Stained	Wood	Intact	Wall B, Door 1	- 0.3	Neg.
42	Door Stop	Stained	Wood	Intact	Wall B, Door 1	- 0.6	Neg.
43	Door Jamb	Stained	Wood	Intact	Wall B, Door 1	- 0.2	Neg.
44	Casing	Stained	Wood	Intact	Wall D, opening	- 0.4	Neg.
45	Jamb	Stained	Wood	Intact	Wall D, opening	- 0.2	Neg.
46	Window Sill	Stained	Wood	Intact	Wall C, Window 1	- 0.3	Neg.
47	Window Casing	Stained	Wood	Intact	Wall C, Window 1	0.0	Neg.
48	Radiator	Tan	Metal	Deter.	Wall D	- 0.3	Neg.
49	Wall	Brown	Paneling	Intact	Wall A	0.0	Neg.
50	Baseboard	Stained	Wood	Intact	Wall B	0.2	Neg.

- Window components not tested are unpainted vinyl.
- Walls B, C, and D are the same as Wall A.
- Floor is carpet.

LEAD BASED PAINT TESTING DATA SHEET



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

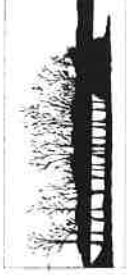
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 04

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
51	Ceiling	White	Sheet Rock	Deter.		- 0.5	Neg.
52	Crown Molding	Stained	Wood	Intact	Wall A	0.4	Neg.
53	Door Casing	Stained	Wood	Intact	Wall A, Door 1	- 0.2	Neg.
54	Door Jamb	Stained	Wood	Intact	Wall A, Door 1	- 0.3	Neg.
55	Door Stop	Stained	Wood	Intact	Wall A, Door 1	0.2	Neg.
56	Radiator	Tan	Metal	Deter.	Wall D	- 0.6	Neg.
57	Backer Board	Light Tan	Wood	Intact	For telecommunications	0.3	Neg.
58	Wall	Brown	Paneling	Intact	Wall C	0.4	Neg.

- Door A-1 has no door (hinges remain).
- Walls A, B, and D are the same as Wall C.
- Floor is carpet.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

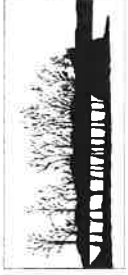
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 05

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
59	Ceiling	White	Sheet Rock	Deter.		- 0.5	Neg.
60	Casing	Stained	Wood	Intact	Wall B, opening	- 0.3	Neg.
61	Jamb	Stained	Wood	Intact	Wall B, opening	0.2	Neg.
62	Radiator	Tan	Metal	Deter.	Wall D	0.3	Neg.
63	Wall	Brown	Paneling	Intact	Wall B	0.1	Neg.
64	Baseboard	Stained	Wood	Deter.	Wall A	- 0.2	Neg.

- Door C-1 components are the same as opening B-1.
- Walls A, C, and D are the same as Wall B.
- Floor is carpet.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

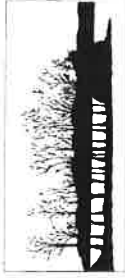
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 06

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
65	Ceiling	White	Sheet Rock	Intact		- 0.0	Neg.
66	Door	Stained	Wood	Intact	Wall D, Door 1	- 0.5	Neg.
67	Door Casing	Cream	Wood	Intact	Wall D, Door 1	- 0.1	Neg.
68	Door Jamb	Cream	Wood	Deter.	Wall D, Door 1	0.3	Neg.
69	Door Stop	Stained	Wood	Deter.	Wall D, Door 1	- 0.2	Neg.
70	Window Sill	White	Wood	Intact	Wall C, Window 1	- 0.2	Neg.
71	Window Apron	White	Wood	Intact	Wall C, Window 1	- 0.3	Neg.
72	Window Casing	White	Wood	Intact	Wall C, Window 1	0.4	Neg.
73	Pipe	White	Metal	Intact	C/D corner	0.2	Neg.
74	Radiator	Tan	Metal	Intact	Wall C	- 0.3	Neg.
75	Wall	White	Sheet Rock	Intact	Wall A	- 0.1	Neg.
76	Wall	White	Sheet Rock	Intact	Wall B	- 0.2	Neg.
77	Wall	White	Sheet Rock	Intact	Wall C	- 0.3	Neg.
78	Wall	White	Sheet Rock	Intact	Wall D	- 0.2	Neg.
79	Baseboard	Cream	White	Deter.	Wall B	0.0	Neg.
80	Floor	Tan	Concrete	Intact	Painted	- 0.2	Neg.

- Window components not tested are unpainted vinyl.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

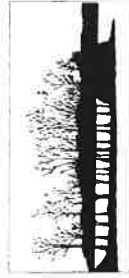
DATE: July 08, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 07

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
81	Door	Stained	Wood	Intact	Wall D, Door 1	- 0.3	Neg.
82	Door Casing	Cream	Wood	Deter.	Wall D, Door 1	- 0.2	Neg.
83	Door Jamb	Cream	Wood	Deter.	Wall D, Door 1	- 0.3	Neg.
84	Door Stop	Stained	Wood	Intact	Wall D, Door 1	0.1	Neg.
85	Cabinet	White	Wood	Deter.	Wall A	- 0.3	Neg.
86	Shelf	White	Wood	Deter.	Wall A, assoc. w/ cabinet	- 0.4	Neg.
87	Pipe	White	Metal	Intact	C/D corner	0.2	Neg.
88	Wall	White	Sheet Rock	Intact	Wall A	- 0.7	Neg.
89	Wall	White	Sheet Rock	Intact	Wall B	- 0.3	Neg.
90	Wall	White	Sheet Rock	Intact	Wall C	- 0.4	Neg.
91	Wall	White	Sheet Rock	Deter.	Wall D	0.0	Neg.
92	Baseboard	Cream	Wood	Deter.	Wall A	- 0.2	Neg.
93	Floor	Tan	Concrete	Intact	Painted	0.2	Neg.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

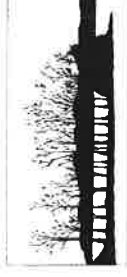
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 08

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
94	Ceiling	White	Sheet Rock	Intact		- 0.1	Neg.
95	Crown Molding	Stained	Wood	Intact	Wall D	- 0.0	Neg.
96	Door	Stained	Wood	Intact	Wall D, Door 1	- 0.5	Neg.
97	Door Casing	Stained	Wood	Intact	Wall D, Door 1	- 0.3	Neg.
98	Door Jamb	Stained	Wood	Intact	Wall D, Door 1	- 0.1	Neg.
99	Door Stop	Stained	Wood	Intact	Wall D, Door 1	- 0.1	Neg.
100	Window Sill	Stained	Wood	Intact	Wall C, Window 1	- 0.2	Neg.
101	Window Apron	Stained	Wood	Intact	Wall C, Window 1	- 0.3	Neg.
102	Window Casing	Stained	Wood	Intact	Wall C, Window 1	- 0.4	Neg.
103	Radiator	Tan	Metal	Deter.	Wall C	- 0.0	Neg.
104	Wall	Lt. Brown	Paneling	Intact	Wall A	- 0.3	Neg.
105	Wall	Dk. Brown	Paneling	Intact	Wall B	0.0	Neg.
106	Baseboard	Stained	Wood	Deter.	Wall A	- 0.4	Neg.

- Window components B-1, B-2, and C-2 are the same as Window C-1; components not tested are unpainted vinyl.
- Wall D is the same as Wall A.
- Wall C is the same as Wall B.
- Floor is carpet.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

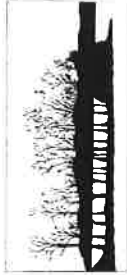
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 09

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
107	Ceiling	White	Sheet Rock	Intact		- 0.1	Neg.
108	Crown Molding	White	Wood	Deter.	Wall A	- 0.1	Neg.
109	Door	Stained	Wood	Intact	Wall A, Door 1	- 0.4	Neg.
110	Door Casing	Stained	Wood	Intact	Wall A, Door 1	- 0.5	Neg.
111	Door Jamb	Stained	Wood	Intact	Wall A, Door 1	- 0.2	Neg.
112	Door Stop	Stained	Wood	Intact	Wall A, Door 1	0.0	Neg.
113	Window Casing	Stained	Wood	Intact	Wall C, Window 1	0.1	Neg.
114	Window Jamb	Stained	Wood	Intact	Wall C, Window 1	- 0.3	Neg.
115	Window Apron	Stained	Wood	Intact	Wall C, Window 1	- 0.2	Neg.
116	Shelf	Black	Wood	Deter.	Wall A	- 0.1	Neg.
117	Casing	Black	Wood	Deter.	Wall A, assoc. w/ circuit panel	- 0.2	Neg.
118	Shelf	Black	Wood	Deter.	Wall D	- 0.1	Neg.
119	Shelf Support	Black	Wood	Deter.	Wall D	- 0.2	Neg.
120	Wall	Black	CMU	Intact	Wall A	0.0	Neg.
121	Wall	Black	Sheet Rock	Intact	Wall A	- 0.2	Neg.
122	Wall	Black	Sheet Rock	Intact	Wall B	- 0.1	Neg.
123	Wall	Black	Sheet Rock	Intact	Wall C	- 0.0	Neg.
124	Wall	Black	Sheet Rock	Intact	Wall D	- 0.5	Neg.
125	Baseboard	Brown	Vinyl	Deter.	Wall A	- 0.1	Neg.
126	Floor	Cream	Vinyl Tile	Deter.		- 0.3	Neg.

LEAD BASED PAINT TESTING DATA SHEET



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

XRF SERIAL NO.: 2471

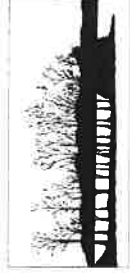
ROOM EQUIVALENT: 09 (continued)

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
---------	-----------	-------	-----------	-------	---------------------------	----------------------------	-------

- Window C-2 components are the same as Window C-1; components not tested are unpainted vinyl.

LEAD BASED PAINT TESTING DATA SHEET



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

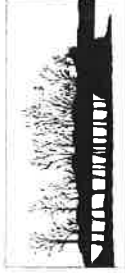
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 10

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
127	Door	Stained	Wood	Intact	Wall D, Door 1	- 0.4	Neg.
128	Door Casing	Stained	Wood	Intact	Wall D, Door 1	- 0.1	Neg.
129	Door Jamb	Stained	Wood	Intact	Wall D, Door 1	- 0.3	Neg.
130	Door Stop	Stained	Wood	Intact	Wall D, Door 1	- 0.6	Neg.
131	Window Sill	Stained	Wood	Intact	Wall A, Window 1	- 0.1	Neg.
132	Window Apron	Stained	Wood	Intact	Wall A, Window 1	- 0.1	Neg.
133	Window Casing	Stained	Wood	Intact	Wall A, Window 1	- 0.3	Neg.
134	Radiator	Tan	Metal	Deter.	Wall A	- 0.3	Neg.
135	Baseboard	Stained	Wood	Deter.	Wall D	- 0.4	Neg.
136	Wall	Stained	Paneling	Deter.	Wall D	- 0.4	Neg.

- Ceiling is suspended ceiling tile.
- Windows A-2, B-1, and B-2 components are the same as Window A-1; components not tested are unpainted vinyl.
- Walls A, B, and C are the same as Wall D.
- Floor is carpet.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

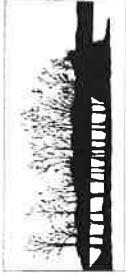
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 11

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
137	Ceiling	White	Sheet Rock	Deter.		- 0.2	Neg.
138	Crown Molding	Stained	Wood	Intact	Ceiling	0.2	Neg.
139	Door	Stained	Wood	Intact	Wall B, Door 1	- 0.3	Neg.
140	Door Casing	Stained	Wood	Intact	Wall B, Door 1	- 0.6	Neg.
141	Door Jamb	Stained	Wood	Intact	Wall B, Door 1	- 0.3	Neg.
142	Door Stop	Stained	Wood	Intact	Wall B, Door 1	- 0.1	Neg.
143	Hatch	White	Wood	Deter.	Ceiling	- 0.2	Neg.
144	Hatch Casing	White	Wood	Deter.	Ceiling	- 0.1	Neg.
145	Cabinet	Stained	Wood	Deter.	Wall D	- 0.2	Neg.
146	Shelves	Stained	Wood	Deter.	Wall D	- 0.1	Neg.
147	Wall	Stained	Paneling	Intact	Wall A	- 0.2	Neg.
148	Wall	Green	Sheet Rock	Deter.	Wall A	- 0.3	Neg.
149	Wall	Green	Sheet Rock	Deter.	Wall B	- 0.1	Neg.
150	Wall	Green	Sheet Rock	Deter.	Wall C	- 0.3	Neg.
151	Wall	Green	Sheet Rock	Deter.	Wall D	0.0	Neg.
152	Baseboard	Stained	Wood	Deter.	Wall C	- 0.2	Neg.

LEAD BASED PAINT TESTING DATA SHEET



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

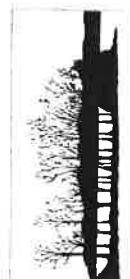
DATE: July 08, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 11 (continued)

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
<ul style="list-style-type: none">- Ceiling is suspended ceiling tile.- Doors B-2, C-1, D-1 and D-2 components are the same as Door B-1.- Door D-2 has no door (hinges remain).- Walls A, B, and C are the same as Wall D.- Closet walls are the same as Wall D.- Floor is carpet.							



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Office

DATE: July 08, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 12

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
153	Baseboard	Stained	Wood	Intact	Wall A	- 0.1	Neg.
154	Crown Molding	Stained	Wood	Intact	Wall D	- 0.1	Neg.
155	Radiator	Tan	Metal	Intact	Wall D	- 0.1	Neg.
156	Door	Grey	Metal	Intact	Wall C, Door 1	- 0.4	Neg.
157	Door Casing	Stained	Wood	Intact	Wall C, Door 1	- 0.0	Neg.
158	Door Jamb	White	Wood	Intact	Wall C, Door 1	- 0.2	Neg.
159	Door Stop	White	Wood	Intact	Wall C, Door 1	- 0.2	Neg.
160	Door	Stained	Wood	Intact	Wall D, Door 2	- 0.2	Neg.
161	Door Casing	Stained	Wood	Intact	Wall D, Door 2	- 0.6	Neg.
162	Door Jamb	Stained	Wood	Intact	Wall D, Door 2	- 0.3	Neg.
163	Door Stop	Stained	Wood	Intact	Wall D, Door 2	- 0.2	Neg.
164	Sash	White	Wood	Intact	Wall D, Door 2, above door	- 0.0	Neg.
165	Wall	Stained	Paneling	Intact	Wall D	- 0.3	Neg.

- Ceiling is suspended ceiling tile.
- Doors B-1, B-2, and D-1 components are the same as Door D-2.
- Walls A, B, and C are the same as Wall D.
- Floor is carpet.

LEAD CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: LC200999

EXPIRES: Monday, March 23, 2020

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to be 'C. L.' or similar, located on the right side of the certificate.

LEAD INSPECTOR TECHNICIAN I

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: IT732966

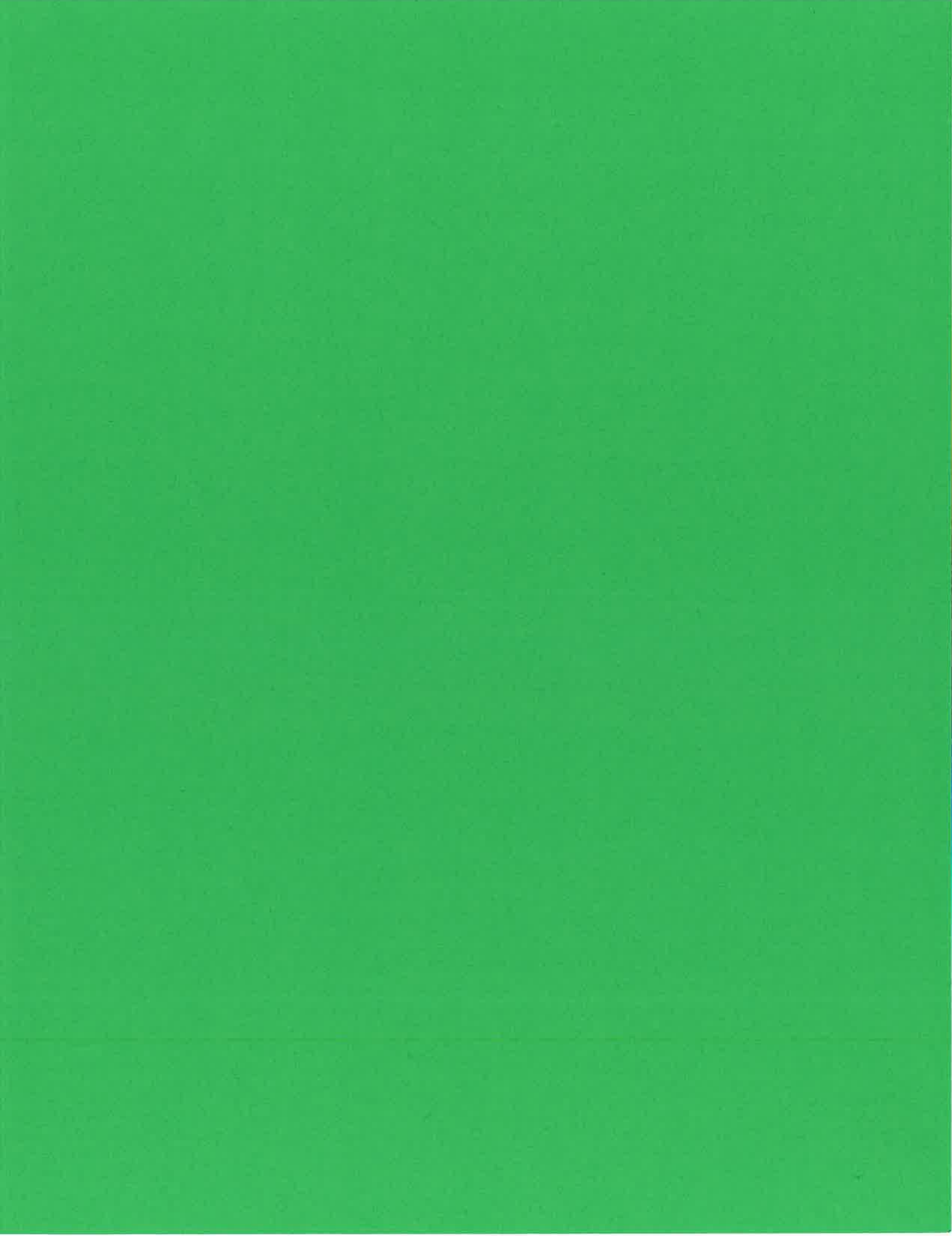
EXPIRES: Wednesday, February 26, 2020

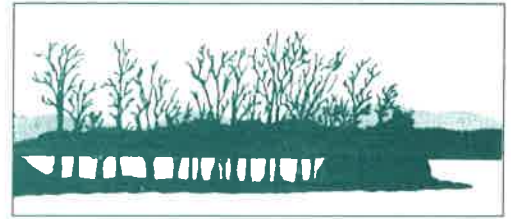
CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.







October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Universal/Electronic Waste
Middlebury Office, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional environmental inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 within the Middlebury Administrative Site, Office Building, 10097 US Route 7 South, Middlebury, Vermont.

During the inspection, CPAI identified all universal/electronic waste inside the building. This inventory did not include underground storage tanks (USTs), or any other subsurface materials/contamination that may be present at the site.

A Drawing depicting CPAI Area Numbers and the Approximate Inventory of Universal/Electronic Waste (Table 1) are attached to this report.

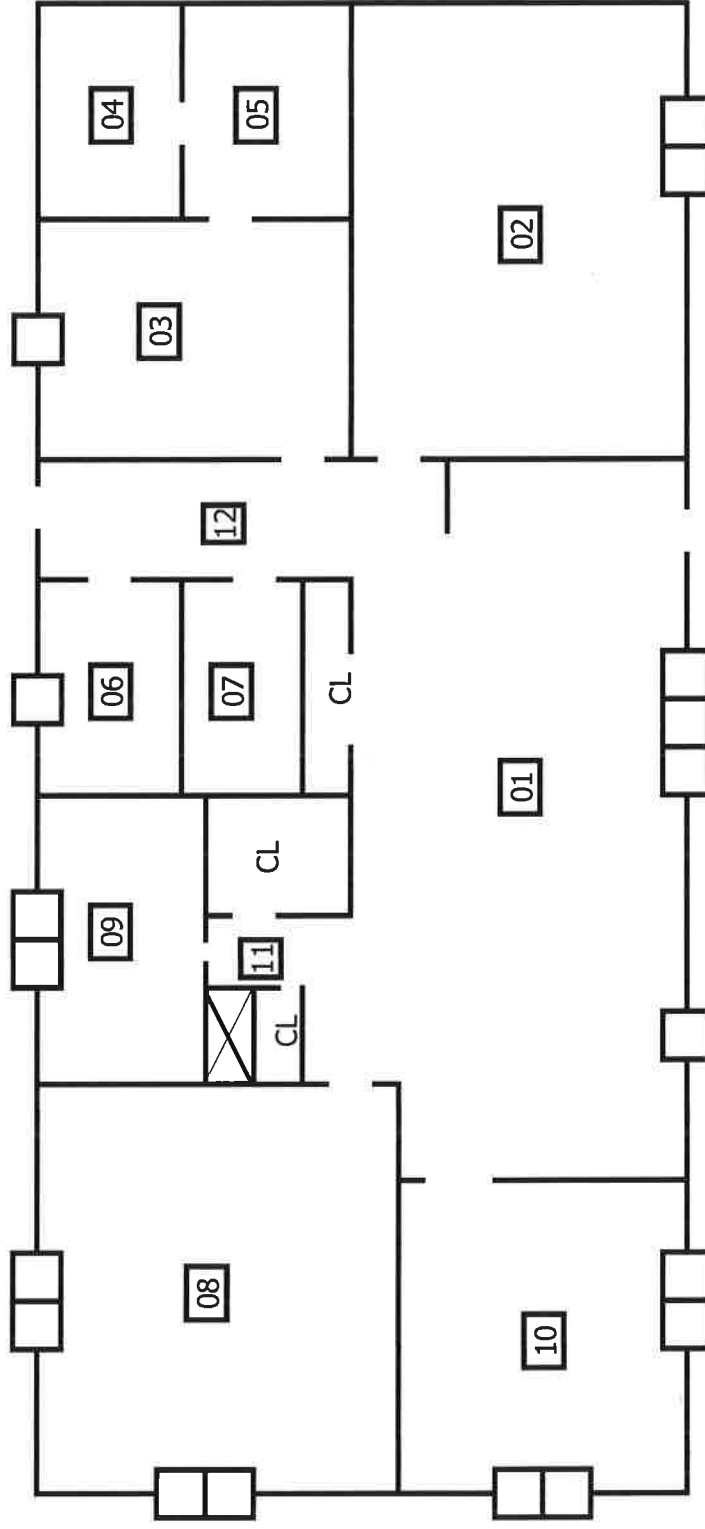
Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

A handwritten signature in black ink, appearing to be 'T. Hobson', written in a cursive style.

Todd C. Hobson
President

Project North



00 = CPAI Area Number

Clay Point Associates, Inc. Project #15014 July 8, 2019	Commercial Structure 1007 US Route 7 South Middlebury, Vermont	Universal Waste Inspection Not to Scale Drawn by: Todd Hobson
---	--	---

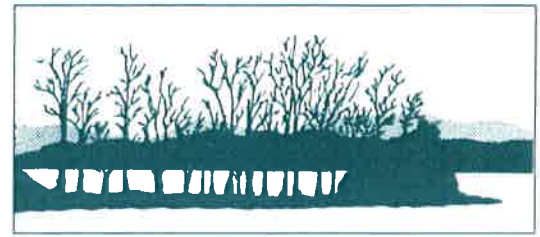


Table 1
Approximate Inventory of Universal Waste

Building/Addition: USFS/Middlebury Administrative Site
Middlebury Office
1007 US Route 7 South
Middlebury, Vermont

CPAI Area No.	Equipment/Item	Approx. Quantity	General Location
01	Fluorescent Light Tubes	28 tubes	On ceiling throughout area.
	Light Ballasts	14 ballasts	On ceiling throughout area.
	Exit Light	1	Southwest section near door.
	Thermostat	1	On south wall.
	Fire Extinguisher	1	On south wall.
02	Fluorescent Light Tubes	16 tubes	On ceiling throughout area.
	Light Ballasts	8 ballasts	On ceiling throughout area.
03	Fluorescent Light Tubes	8 tubes	On ceiling throughout area.
	Light Ballasts	4 ballasts	On ceiling throughout area.
04	Fluorescent Light Tubes	4 tubes	On ceiling throughout area.
	Light Ballasts	2 ballasts	On ceiling throughout area.
	Fiber/E-waste	Misc.	On north wall.

Table 1
Approximate Inventory of Universal Waste

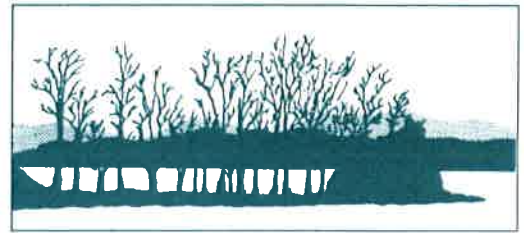
Building/Addition:		USFS/Middlebury Administrative Site Middlebury Office 1007 US Route 7 South Middlebury, Vermont	
CPAI Area No.	Equipment/Item	Approx. Quantity	General Location
05	Fluorescent Light Tubes	4 tubes	On ceiling throughout area.
	Light Ballasts	2 ballasts	On ceiling throughout area.
	Air Conditioner	1	On south wall.
06	Fluorescent Light Tubes	2 tubes	On ceiling throughout area.
	Light Ballasts	1 ballast	On ceiling throughout area.
07	Fluorescent Light Tubes	1 tubes	On ceiling throughout area.
	Light Ballasts	2 ballasts	On ceiling throughout area.
08	Fluorescent Light Tubes	16 tubes	On ceiling throughout area.
	Light Ballasts	8 ballasts	On ceiling throughout area.
	Thermostat	1	On south wall.
	Thermometer	1	On north wall.
09	Fluorescent Light Tubes	2 tubes	On ceiling throughout area.
	Light Ballasts	1 ballast	On ceiling throughout area.
	Paint Can	1 can	Southeast corner.
	CLR	1 can	On south wall shelves.
10	Fluorescent Light Tubes	8 tubes	On ceiling throughout area.
	Light Ballasts	4 ballasts	On ceiling throughout area.

Table 1
Approximate Inventory of Universal Waste

Building/Addition:		USFS/Middlebury Administrative Site Middlebury Office 1007 US Route 7 South Middlebury, Vermont	
CPAI Area No.	Equipment/Item	Approx. Quantity	General Location
11	Fire Extinguisher	1	South wall, east section.
11 North Closet	Fluorescent Light Tubes	2 tubes	Ceiling throughout area.
	Light Ballasts	1 ballast	Ceiling throughout area.
12	Fluorescent Light Tubes	1 tube	Ceiling throughout area.
	Light Ballasts	2 ballasts	Ceiling throughout area.
	Emergency Light	1	On north wall.
	Exit Light	1 light	At east wall.

Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Asbestos Containing Materials
Middlebury Workshop, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional asbestos inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 on/within the Middlebury Administrative Site, Workshop, 1007 US Route 7 South, Middlebury, Vermont. Inspection activities were limited to evaluation of accessible suspect asbestos containing materials.

On July 8, 2019, CPAI collected twenty (20) bulk samples from suspect asbestos containing materials. All bulk samples were submitted to a Vermont certified analytical service. Nineteen (19) bulk samples were analyzed by Polarized Light Microscopy (PLM), Visual Estimation Method, according to EPA Method 600/R-93/116. Identification of asbestos by PLM is based on optical crystallographic properties, and gives a qualitative differentiation between types of asbestos and other fibrous materials. It also allows for a quantitative estimate of percent asbestos using EPA approved methods. One (1) sample was not analyzed in accordance with our stop positive protocol. Two (2) additional layers within the bulk samples submitted by CPAI were detected by the analytical service and analyzed by PLM.

A Drawing depicting existing conditions/ CPAI Area Numbers, The Bulk Sample Analysis Inventory (Table 1), the Inventory of Asbestos Containing Materials (Table 2), analytical service bulk sample analysis report and CPAI/analytical service certification information are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

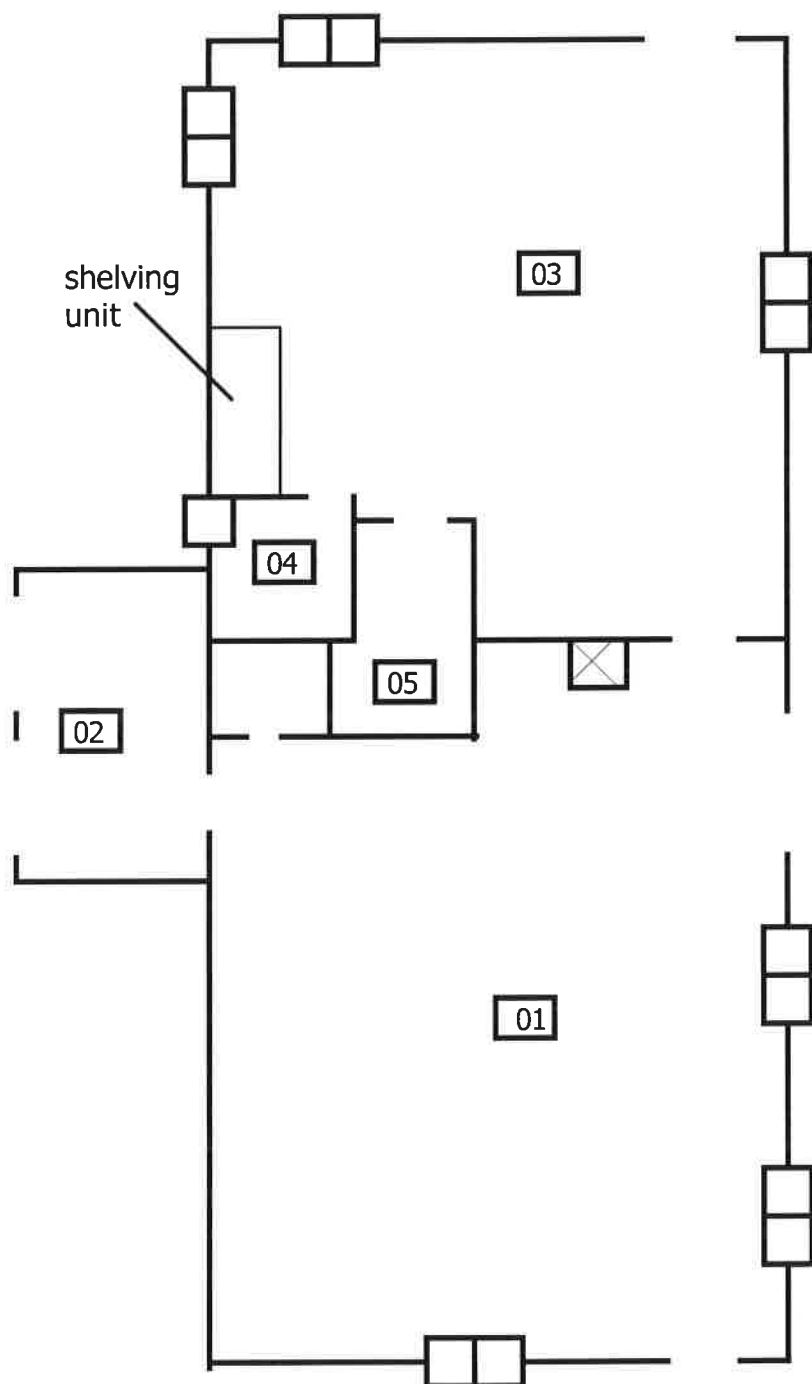
A handwritten signature in black ink, appearing to read 'Todd C. Hobson', is written over the company name.

Todd C. Hobson
President

Middlebury Workshop



Project North



00 = CP AI Area Number

Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury, Vermont

Asbestos Inspection
Not to Scale
Drawn by: Todd C. Hobson

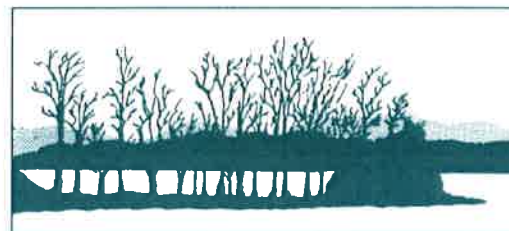


Table 1
Bulk Sample Analysis Inventory

Building/Addition:		USFS/Middlebury Administrative Site Middlebury Workshop 1007 US Route 7 South Middlebury, Vermont			
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Mudded Material, assoc. w/ woodstove exhaust	07081915014-41	07/08/19	1930319-007	CPAI Area #01, from west side of chimney, 5 ft. 10 in. from floor.	NAD
Joint Compound assoc. w/ Gypsum Wallboard (Sheet Rock)	07081915014-49	07/08/19	1930319-010	CPAI Area #04, on south wall, 4 ft. 1 in. from west wall, 4 ft. from floor.	NAD
	07081915014-44	07/08/19	1930319-011	CPAI Area #04, on north wall, 4 ft. 3 in. from west wall, 4 ft. 8 in. from floor.	NAD
	07081915014-32	07/08/19	1930319-012	CPAI Area #03, on ceiling, 12 ft. 10 in. from south wall, 5 ft. 3 in. from westernmost wall.	2% Chrys.
	07081915014-48	07/08/19	1930319-013	CPAI Area #03, 13 ft. 7 in. from south wall, 20 ft. 2 in. from east wall.	2% Chrys.
Gypsum Wallboard (Sheet Rock)	07081915014-54	07/08/19	1930319-015	CPAI Area #03, on ceiling, 16 ft. 8 in. from south wall, 11 ft. 3 in. from east wall.	NAD
	07081915014-52	07/08/19	1930319-016	CPAI Area #03, on ceiling, 5 ft. 10 in. from south wall, 4 ft. 9 in. from east wall.	NAD

Table 1
Bulk Sample Analysis Inventory

Building/Addition:			USFS/Middlebury Administrative Site Middlebury Workshop 1007 US Route 7 South Middlebury, Vermont		
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Pressed Board Material as pegboard (Masonite)	07081915014-33	07/08/19	1930319-008	CPAI Area #01, on west wall, 13 ft. 4 in. from north wall, 3 ft. 8 in. from floor.	NAD
	07081915014-12	07/08/19	1930319-009	CPAI Area #01, on east wall, 12 ft. 11 in. from north wall, 1 ft. 2 in. from floor.	NAD
Concrete	07081915014-47	07/08/19	1930319-001	CPAI Area #01, from poured floor (slab), 10 ft. 9 in. from west wall, 7 in. from south wall.	NAD
	07081915014-50	07/08/19	1930319-002	CPAI Area #03, from poured floor (slab), 8 ft. 1 in. from south wall, 20 ft. from east wall.	NAD
Mortar assoc. w/ concrete block (CMU)	07081915014-46	07/08/19	1930319-003	CPAI Area #01, on south wall, 14 ft. 7 in. from west wall, 8 in. from floor.	NAD
	07081915014-45	07/08/19	1930319-004	CPAI Area #03, on south wall, 22 ft. from east wall, 8 in. from floor.	NAD
Mortar assoc. w/ chimney block	07081915014-43	07/08/19	1930319-005	CPAI Area #01, from northwest corner of chimney, 3 ft. 10 in. from floor.	NAD (2 layers)
	07081915014-42	07/08/19	1930319-006	CPAI Area #03, from southeast corner of chimney, 3 ft. 11 in. from floor.	NAD (2 layers)

Table 1
Bulk Sample Analysis Inventory

Building/Addition:			USFS/Middlebury Administrative Site Middlebury Workshop 1007 US Route 7 South Middlebury, Vermont		
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Blown-in Insulation	07081915014-57	07/08/19	1930319-019	Attic, from west section.	NAD
	07081915014-53	07/08/19	1930319-020	Attic, from east section.	NAD
Flashing Cement	07081915014-59	07/08/19	1930319-017	Exterior, at southwest corner of building between concrete sections of sidewalk.	8% Chrys.
	07081915014-60	07/08/19	1930319-018	Exterior, southern elevation, east section, between building and sidewalk.	n/a
Roofing Shingles, green *	07081915014-51	07/08/19	1930319-014	Exterior, north pitch, from northwest corner.	NAD
<p>PLM = Polarized Light Microscopy NAD = No Asbestos Detected Chrys. = Chrysotile Asbestos n/a = sample not analyzed, analysis stopped at 1st positive result in group * = An additional sample of this suspect asbestos material was collected from the Middlebury Oil & Gas Building</p>					

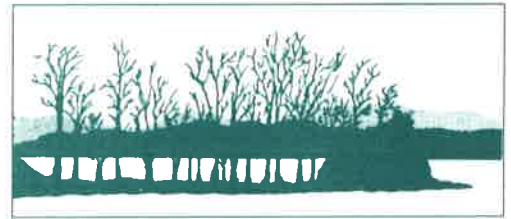


Table 2
Inventory of Asbestos Containing Materials

Location:		USFS/Middlebury Administrative Site Middlebury Workshop 1007 US Route 7 South Middlebury, Vermont	
CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
03	Joint Compound, associated with gypsum wallboard (sheet rock)	862 sq. ft.	On entire ceiling.
05	Joint Compound, associated with gypsum wallboard (sheet rock)	77 sq. ft.	On entire ceiling, including over all storage cabinets.
Exterior	Flashing Cement, associated with pavement and concrete	Misc.	Exterior, South Elevation & West Elevation, near entry door: - at junction of concrete ramp and building - at seams in concrete ramp - at junction of concrete ramp and pavement - patched intermittently in pavement cracks/seams



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston VT 05495

Project Reference: 15014-Batch #5
Laboratory Batch #: 1930319
Date Samples Received: 07/09/2019
Date Samples Analyzed: 07/17/2019
Date of Final Report: 07/17/2019

SAMPLE IDENTIFICATION:

Twenty (20) samples from CPAI Project #: 15014 - Batch #5 project were submitted by Todd Hobson on 07/09/2019

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-600/M4-82-020, EPA-600/ R-93-116). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.


In any given material, fibers with a small diameter ($<0.25\mu\text{m}$) may not be detected by the PLM method. Floor tile and other resinously bound material may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additional analytical methods may be required. Optimum recommends using Transmission Electron Microscopy (TEM) for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.


Use of the NVLAP and AIHA Logo in no way constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit $<1\%$, Reporting Limits: CVES = 1% , 400 Point Count = $.25\%$, 1000 Point Count = 0.1% ; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.



Jamie L. Noel
Laboratory Director



Kristina Scaviola
Laboratory Supervisor



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #5

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930319
PROJECT #: 15014-Batch #5
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/17/2019
REPORT DATE: 07/17/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
1930319-001 07081915014.47	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 3% Synthetic Fiber 2% Fibrous Glass 2% Binder/Filler 93%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-002 07081915014.50	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-003 07081915014.46	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-004 07081915014.45	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-005 07081915014.43	LAYER 1 Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
	LAYER 2 Bulk Material, White	LAYER 2 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-006 07081915014.42	LAYER 1 Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
	LAYER 2 Bulk Material, White	LAYER 2 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-007 07081915014.41	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
Total % Asbestos:			No Asbestos Detected	Total % Non-Asbestos: 100.0%



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #5

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930319
PROJECT #: 15014-Batch #5
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/17/2019
REPORT DATE: 07/17/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
1930319-008 07081915014.33	Bulk Material, Brown	LAYER 1 100%	None Detected	Cellulose Fiber 97% Binder/Filler 3%
		Total % Asbestos:	No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-009 07081915014.12	Bulk Material, Brown	LAYER 1 100%	None Detected	Cellulose Fiber 97% Binder/Filler 3%
		Total % Asbestos:	No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-010 07081915014.49	Bulk Material, Beige/White Note: Mostly Paint	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
		Total % Asbestos:	No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-011 07081915014.44	Bulk Material, Beige/White Note: Mostly Paint	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
		Total % Asbestos:	No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-012 07081915014.32	Bulk Material, Beige/White	LAYER 1 100%	Chrysotile 2%	Cellulose Fiber 1% Binder/Filler 97%
		Total % Asbestos:	2.0%	Total % Non-Asbestos: 98.0%
1930319-013 07081915014.48	Bulk Material, Beige/White	LAYER 1 100%	Chrysotile 2%	Cellulose Fiber 1% Binder/Filler 97%
		Total % Asbestos:	2.0%	Total % Non-Asbestos: 98.0%
1930319-014 07081915014.51	Bulk Material, Black	LAYER 1 100%	None Detected	Cellulose Fiber 1% Fibrous Glass 35% Binder/Filler 64%
		Total % Asbestos:	No Asbestos Detected	Total % Non-Asbestos: 100.0%
1930319-015 07081915014.54	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 10% Binder/Filler 90%
		Total % Asbestos:	No Asbestos Detected	Total % Non-Asbestos: 100.0%



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #5

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930319
PROJECT #: 15014-Batch #5
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/17/2019
REPORT DATE: 07/17/2019
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
1930319-016 07081915014.52	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	10% 90%
Total % Asbestos:			No Asbestos Detected		Total % Non-Asbestos: 100.0%	
1930319-017 07081915014.59	Bulk Material, Black	LAYER 1 100%	Chrysotile	8%	Cellulose Fiber Binder/Filler	2% 90%
Total % Asbestos:			8.0%		Total % Non-Asbestos: 92.0%	
1930319-018 07081915014.60	Bulk Material, Black Note: Positive Stop	LAYER 1 100%				
1930319-019 07081915014.57	Bulk Material, Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	98% 2%
Total % Asbestos:			No Asbestos Detected		Total % Non-Asbestos: 100.0%	
1930319-020 07081915014.53	Bulk Material, Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	98% 2%
Total % Asbestos:			No Asbestos Detected		Total % Non-Asbestos: 100.0%	

**Analyst
Signatory:**
Jamie Noel

NVLAP
Lab Code: 101433-0



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #5

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930319
PROJECT #: 15014-Batch #5
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/17/2019
REPORT DATE: 07/17/2019
ANALYST: Jamie Noel



Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

CPAI Proj #:

15014

		Type				Sample Number(s)
Asb?	Oil?	Air	For	H2O		
X			X			07081915014.12, 32.33, 41-54, 57.59.60

	Date	Time	Name	Signature
Transfer #1	070819	18:52	Todd Hobson	
to		sent to	Optimum by	Fed X
Transfer #2	7/9/19	12:50	Molly McKELLS	
to				
Transfer #3				
to				

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #5

ORDER #: 1930319
PROJECT #: 15014-Batch #5
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/17/2019
REPORT DATE: 07/17/2019
ANALYST: Jamie Noel

1930319



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Batch 5

5 day
turnaround

Date of Submission: 08 July 2019 CPAI Proj. #: 15014

Analytical Service: Optimum

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
07081915014. 47	07.08.19	PLM	1	Analyze PLM
.50			2	
.46			3	
.45			4	
.43			5	
.42			6	
.41			7	
.33			8	
.12			9	
.49			10	
.44			11	
.32			12	
.48			13	
.51			14	
.54			15	

Chain of Custody Form Attached?

Yes No

Consultant Signature: _____

Page No.: 1 of 50

Submitted 7/9/19 12:50

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Project #: 15014 - Batch #5

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-600/M4-82-020, EPA-600/ R-93-116) NVLAP Lab Code: 101433-0

ORDER #: 1930319
PROJECT #: 15014-Batch #5
DATE COLLECTED: 07/08/2019
COLLECTED BY: Todd Hobson
DATE RECEIVED: 07/09/2019
ANALYSIS DATE: 07/17/2019
REPORT DATE: 07/17/2019
ANALYST: Jamie Noel

1930319

Clay Point Associates, Inc.



BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: _____ CPAI Proj. #: _____

Analytical Service: _____

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
07081915014. 52			16	Analyze PLM
. 54			17	Stop Positive
. 60			17	
. 57				
. 53				

Chain of Custody Form Attached?

Yes No

Consultant Signature: _____

Page No.: _____ of _____

Todd Hobson 7/9/19 12:50

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600

ASBESTOS CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: CE998564

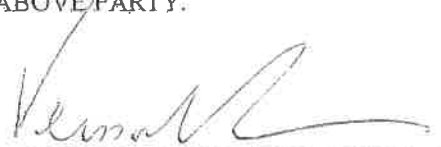
EXPIRES: Monday, April 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.

THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in black ink, appearing to be "Vernon", is written over the bottom right portion of the certificate text.

ASBESTOS INSPECTOR/MANAGEMENT PLANNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: MF262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT DESIGNER

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PD262143

EXPIRES: Thursday, February 06, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PROJECT MONITOR

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PM262143

EXPIRES: Sunday, March 01, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS ANALYTICAL SERVICES

OPTIMUM ANALYTICAL AND CONSULTING, LLC
85 STILES ROAD, STE 201
SALEM, NH 03078

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: AL143503

EXPIRES: Wednesday, June 17, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.
THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.
COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

AIR ANALYSIS BY PCM

BULK ANALYSIS BY PLM

A handwritten signature in blue ink, appearing to be 'CM', is located to the right of the 'BULK ANALYSIS BY PLM' text.

ASBESTOS PCM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PA307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



ASBESTOS PLM ANALYST

JAMIE L. NOEL
4 EDGEWOOD LANE
RAYMOND, NH 03077

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PB307779

EXPIRES: Tuesday, February 11, 2020

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.



VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos PCM Analyst
Not a Legal Form of ID

JAMIE L. NOEL

Eff. Date 02/11/19
Exp. Date 02/11/20



CONES
PA307779



Renewal

VERMONT DEPARTMENT OF HEALTH
Asbestos & Lead Regulatory Program

Asbestos PLM Analyst
Not a Legal Form of ID

JAMIE L. NOEL

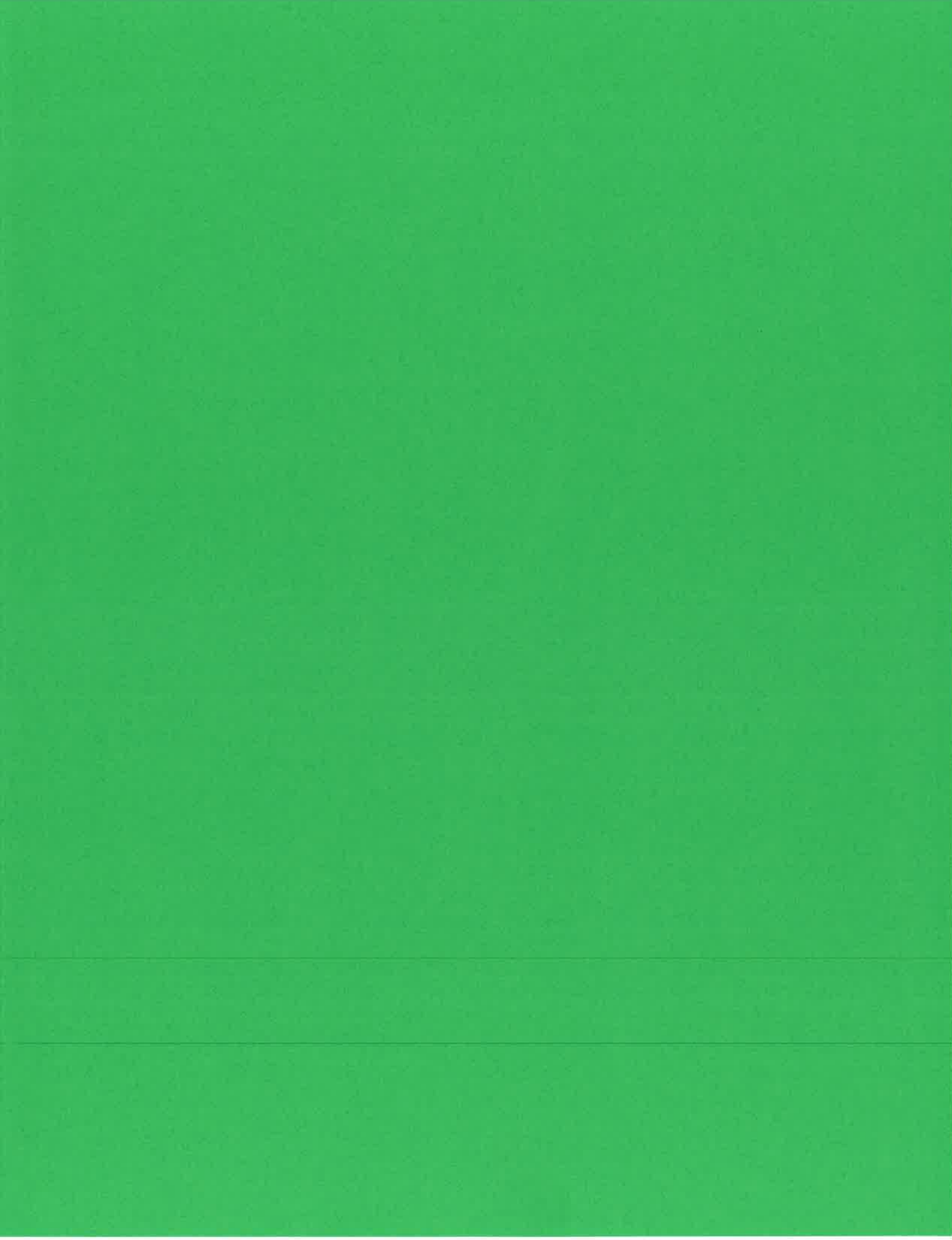
Eff. Date 02/11/19
Exp. Date 02/11/20



CONES
PB307779



Renewal



Clay Point Associates, Inc.

www.claypointassociates.com



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Report of Lead-Based Paint Inspection
Middlebury Workshop, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed for your review is the Clay Point Associates, Inc. (CPAI) report related to the lead-based paint inspection performed on July 8, 2019 on/within the Middlebury Administrative Site, Workshop, 1007 US Route 7 South, Middlebury Vermont. The inspection was performed in accordance with the guidelines outlined in Chapter 7: Lead-Based Paint Inspection of the U.S. Department of Housing and Urban Development's, "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing", July 2012 revision (HUD).

For your information, lead-based paint was detected on/within the structure.

On-site testing was performed by use of a portable x-ray fluorescence analyzer (XRF). Specifically, a Viken Detection Pb200i Handheld XRF Lead Paint Analyzer, serial number #2074, was used by CPAI to inspect all accessible painted/stained surfaces. The XRF calibration was checked according to the manufacturer's recommendations and the guidelines outlined in the December 1, 2006, Performance Characteristic Sheet (PCS) for the above referenced instrument. In addition, precautionary measures were taken to ensure that building occupants, inspectors, and escorts were not inadvertently exposed to radiation as a result of testing.

Attached are copies of the "Lead-Based Paint Testing Data Sheets" generated during the inspection. The sheets reference locations in each room/area where representative XRF testing was performed. Walls in each room/area were assigned an A, B, C or D letter notation. The A Wall in each room/area is always at the street side of the building (US Route 7 South). Notations then proceed clockwise from the A wall to the B, C and D walls. If more than one door or window is on one particular wall, the #1 door/ window is always on the inspector's left as s/he faces the wall. Notations then proceed left to right from 1, to 2, to 3, etc. Also attached please find "Lead Survey Building Sketches" which provide room/area numbers and descriptions of each room's use (i.e. Kitchens, Bathrooms, Bedrooms, etc.).

Mr. David Donahue
October 16, 2019
Page 2

XRF readings are classified into two categories: positive (lead-based paint) and negative (not defined as lead-based paint). The appropriate category is noted in the far right column on the Lead-Based Paint Testing Data Sheets. The Vermont Regulations For Lead Control, V.S.A. Title 18, Chapter 38, Effective October 2, 1994, amended May 1, 2001, defines Lead-Based Paint in target housing and daycare facilities as "paint or other surface coatings that contain lead in excess of 1.0 mg/sq. cm. or 0.5 percent by weight (5,000 ppm), or (1) in the case of paint or other surface coatings such lower level as may be established by the Secretary of Housing and Urban Development, as defined by Section 302 (c) of the Lead Based Paint Poisoning Prevention Act, or (2) in the case of any other paint or surface coatings, such other level as may be established by the Administrator of EPA." The Vermont Occupational Safety and Health Administration (VOSHA) does not specify a regulated quantity of lead within paint. Applicable VOSHA regulations address the presence of lead within paint regardless of specific quantity present.

Please note that this document does not provide a comprehensive inventory of components with lead-based paint. This is because protocols do not require testing of every inch of a painted/ stained surface.

Components with the same paint history as those tested may contain lead-based paint within each room or on the building exterior (i.e., under the currently visible paint layer). In addition, protocols do not require testing of more than one item from the same testing component within each room (i.e., if more than one window was present in a room, and if CPAI tested window components from one window and they were positive, then the same window components from the other windows in the room should be assumed to be positive).

All lead-based paint inspection activities were performed by Todd C Hobson. Mr. Hobson is a State of Vermont certified Lead Inspector Technician I (#IT732966). Specific hours of on-site testing are available upon request.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this inspection report, or require additional services, please contact us at (802) 879-2600.

Sincerely,
CLAY POINT ASSOCIATES, INC.



Todd C. Hobson
President

Middlebury Workshop



Project North

C

shelving unit

03

04

05

02

01

D

00 = CPAI Area Number

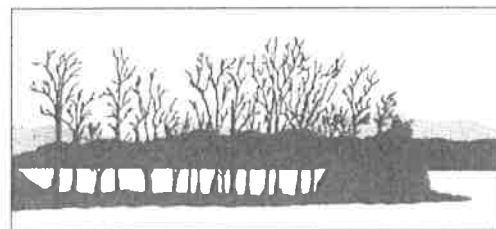
A

US Rt. 7

Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury, Vermont

Lead-Based Paint Inspection
Not to Scale
Drawn by: Todd Hobson



Calibration Check Test Results

ADDRESS: Commercial Structures
1007 US Route 7
Middlebury, Vermont

DATE: 07/08/19
INSPECTOR: Todd C. Hobson
XRF SERIAL NO.: 2471

Start Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
9:32	01	1.1
	02	1.0
	03	1.1
	Average:	1.1

Start Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
9:41	04	- 0.1
	05	- 0.2
	06	- 0.2
	Average:	-0.2

Mid Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
1:15	272	1.1
	273	1.0
	274	1.0
	Average:	1.0

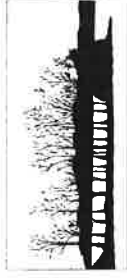
Mid Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
1:26	275	- 0.2
	276	- 0.1
	277	- 0.2
	Average:	- 0.2

End Calibration Check (RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
2:52	292	1.0
	293	1.1
	294	1.1
	Average:	1.1

End Calibration Check, Zero (Back of RMD Standard Block)		
Time:	Reading:	Calibration (mg./sq. cm.):
3:01	295	- 0.2
	296	- 0.2
	297	- 0.2
	Average:	- 0.2

Calibration Check Tolerance Used **1.0 mg./sq. cm.**
XRF Calibration Check Limits: 0.7 mg./sq. cm. to 1.3 mg./sq. cm. (inclusive)

Inspector Signature: _____



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Workshop

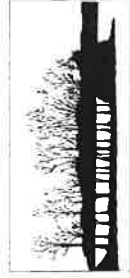
DATE: July 8, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 01

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
166	Ceiling	White	Sheet Rock	Deter.		- 0.2	Neg.
167	Ceiling	White	Particle Bd.	Deter.		- 0.0	Neg.
168	Door	Grey	Metal	Deter.	Wall A, Door 1	- 0.5	Neg.
169	Door Casing	Grey	Metal	Deter.	Wall A, Door 1	- 0.3	Neg.
170	Door Jamb	Grey	Metal	Deter.	Wall A, Door 1	- 0.4	Neg.
171	Door Stop	Grey	Metal	Deter.	Wall A, Door 1	- 0.3	Neg.
172	Door	Grey	Metal	Deter.	Wall B, Door 1	- 0.6	Neg.
173	Door Casing	White	Wood	Deter.	Wall B, Door 1	- 0.2	Neg.
174	Door Jamb	White	Wood	Deter.	Wall B, Door 1	- 0.4	Neg.
175	Door Stop	White	Wood	Deter.	Wall B, Door 1	- 0.2	Neg.
176	Door	White	Wood	Deter.	Wall C, Door 1	- 0.2	Neg.
177	Door Casing	White	Wood	Deter.	Wall C, Door 1	0.2	Neg.
178	Door Jamb	White	Wood	Deter.	Wall C, Door 1	- 0.1	Neg.
179	Door Stop	White	Wood	Deter.	Wall C, Door 1	0.0	Neg.
180	Door Casing	Stained	Wood	Deter.	Wall C, Door 2	- 0.1	Neg.
181	Door Stop	White	Wood	Deter.	Wall C, Door 2	- 0.2	Neg.
182	Door Jamb	White	Wood	Deter.	Wall C, Door 2	- 0.1	Neg.
183	Door	White	Wood	Deter.	Wall C, Door 2	1.0	POS.
184	Door	White	Fiberglass	Deter.	Wall D, Door 1, garage	- 0.3	Neg.
185	Window Sill	White	Wood	Deter.	Wall D, Window 2	- 0.2	Neg.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Workshop

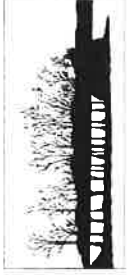
DATE: July 8, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 01 (continued)

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
186	Window Apron	White	Wood	Deter.	Wall D, Window 2	0.0	Neg.
187	Window Casing	White	Wood	Deter.	Wall D, Window 2	0.0	Neg.
188	Window Stop	White	Wood	Deter.	Wall D, Window 2	- 0.1	Neg.
189	Hatch	White	Wood	Deter.	Wall B	- 0.3	Neg.
190	Hatch Casing	White	Wood	Deter.	Wall B	- 0.2	Neg.
191	Horiz. Support	White	Wood	Deter.	Wall B	0.1	Neg.
192	Diag. Support	White	Wood	Deter.	Wall D	- 0.2	Neg.
193	Horiz. Support	White	Wood	Deter.	Wall D	- 0.1	Neg.
194	Vert. Support	White	Wood	Deter.	Wall D	- 0.1	Neg.
195	Peg Board	Brown	Peg Board	Deter.	Wall A, above workbench	- 0.7	Neg.
196	Peg Board	White	Wood	Deter.	Wall B	- 0.5	Neg.
197	Shelves	White	Wood	Deter.	Wall A	- 0.3	Neg.
198	Shelves	White	Wood	Deter.	Wall B	- 0.1	Neg.
199	Cabinets	Brown	Wood	Deter.	Wall A	- 0.3	Neg.
200	Counter	Brown	Wood	Deter.	Wall A, assoc. w/ cabinets	- 0.1	Neg.
201	Molding	White	Wood	Deter.	Wall A, assoc. w/ counter	0.0	Neg.
202	Wall	White	Comp. Board	Deter.	Wall A	- 0.2	Neg.
203	Wall	White	Comp. Board	Deter.	Wall B	- 0.4	Neg.
204	Wall	Brown	Comp. Board	Deter.	Wall C	- 0.4	Neg.
205	Wall	Brown	Concr. Block	Deter.	Wall C	0.0	Neg.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Workshop

DATE: July 8, 2019

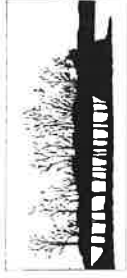
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 01 (continued)

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
206	Wall	White	Concr. Block	Deter.	Wall C	- 0.0	Neg.
207	Wall	White	Comp. Board	Deter.	Wall C	- 0.6	Neg.
208	Wall	White	Comp. Board	Deter.	Wall D	- 0.0	Neg.

- Ceiling is particleboard.
- Closet components are unpainted/unstained (C-1).
- Window A-1, A-2, D-1, D-3, and D-4 components are the same as Window D-2; components not tested are unpainted vinyl.
- Floor is unpainted concrete slab.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Workshop

DATE: July 8, 2019

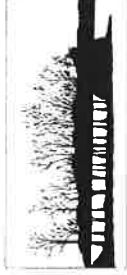
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 02

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
209	Door	White	Metal	Deter.	Wall D, Door 1	- 0.1	Neg.
210	Door Casing	White	Wood	Deter.	Wall D, Door 1	- 0.3	Neg.
211	Door Jamb	White	Wood	Deter.	Wall D, Door 1	- 0.2	Neg.
212	Door Stop	White	Wood	Deter.	Wall D, Door 1	- 0.1	Neg.
213	Door	White	Metal	Intact	Wall B, Door 1, garage	0.0	Neg.
214	Wall	Green	Metal	Intact	Wall A	- 0.0	Neg.
215	Wall	White	Wood	Deter.	Wall D	3.4	POS.

- Ceiling is unpainted/unstained.
- Door B-2 (garage) components are the same as Door B-1 (garage).
- Walls B and C are unpainted/unstained wood.
- Floor is unpainted concrete slab.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Workshop

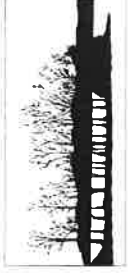
DATE: July 8, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 03

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
216	Door	White	Wood	Deter.	Wall A, Door 1	1.0	POS.
217	Door Casing	Stained	Wood	Deter.	Wall A, Door 1	- 0.3	Neg.
218	Door Jamb	White	Wood	Deter.	Wall A, Door 1	- 0.2	Neg.
219	Door Stop	White	Wood	Deter.	Wall A, Door 1	- 0.1	Neg.
220	Door	White	Wood	Deter.	Wall A, Door 3	4.3	POS.
221	Door Casing	White	Wood	Deter.	Wall A, Door 3	2.4	POS.
222	Door Jamb	White	Wood	Deter.	Wall A, Door 3	1.0	POS.
223	Door Stop	White	Wood	Deter.	Wall A, Door 3	1.0	POS.
224	Door	White	Wood	Deter.	Wall B, Door 1, Closet	- 0.1	Neg.
225	Door	White	Wood	Deter.	Wall B, Door 3, Closet	- 0.1	Neg.
226	Window Sill	White	Wood	Deter.	Wall B, Window 1	0.1	Neg.
227	Window Apron	White	Wood	Deter.	Wall B, Window 1	- 0.1	Neg.
228	Window Casing	White	Wood	Deter.	Wall B, Window 1	0.1	Neg.
229	Window Sash	White	Wood	Deter.	Wall B, Window 1	0.1	Neg.
230	Vert. Support	White	CMU	Deter.	Wall A, assoc. w/ wood stove	- 0.1	Neg.
231	Shelf Support	Blue	Wood	Deter.	Assoc. w/ C-1 closet	- 0.2	Neg.
232	Shelf	Grey	Wood	Deter.	Assoc. w/ C-1 closet	- 0.2	Neg.
233	Cabinets	Blue	Wood	Deter.	C/D corner	- 0.2	Neg.
234	Molding	White	Wood	Deter.	Wall D, assoc. w/ cabinets	0.2	Neg.
235	Wall	White	Comp. Board	Deter.	Wall A	- 0.1	Neg.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Workshop

DATE: July 8, 2019

XRF SERIAL NO.: 2471

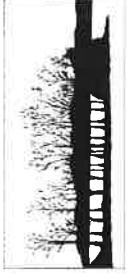
ROOM EQUIVALENT: 03 (continued)

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
236	Wall	White	Comp. Board	Deter.	Wall B	- 0.0	Neg.
237	Wall	White	Comp. Board	Deter.	Wall C	- 0.1	Neg.
238	Wall	White	Comp. Board	Deter.	Wall D	0.1	Neg.
239	Floor	Grey	Concrete	Deter.		- 0.2	Neg.

- Door A-2 components are the same as Door A-1.
- Door C-2 components are the same as Door C-1.
- Window B-2, C-1, C-2, D-1 and D-2 components are the same as Window B-1.

POS.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Workshop

DATE: July 8, 2019

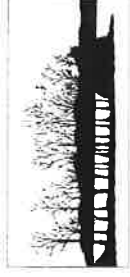
XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 04

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
240	Ceiling	White	Sheet Rock	Deter.		- 0.1	Neg.
241	Corner Board	Green	Vinyl	Deter.	Wall D	- 0.8	Neg.
242	Baseboard	White	Wood	Deter.	Wall D	- 0.2	Neg.
243	Door	White	Wood	Deter.	Wall C, Door 1	1.0	POS.
244	Door Casing	White	Wood	Deter.	Wall C, Door 1	1.0	POS.
245	Door Jamb	Stained	Wood	Deter.	Wall C, Door 1	1.0	POS.
246	Window Sill	White	Wood	Deter.	Wall B, Window 1	- 0.2	Neg.
247	Window Casing	White	Wood	Deter.	Wall B, Window 1	- 0.2	Neg.
248	Cabinet	White	Wood	Deter.	Wall C	- 0.2	Neg.
249	Wall	White	Wood	Deter.	Wall A	- 0.2	Neg.
250	Wall	White	Wood	Deter.	Wall B	- 0.1	Neg.
251	Wall	White	Wood	Deter.	Wall C	- 0.3	Neg.
252	Wall	White	Wood	Deter.	Wall D	- 0.1	Neg.
253	Floor	Grey	Concr. Slab	Deter.		- 0.1	Neg.

- Window components not tested are unpainted vinyl.



Clay Point Associates, Inc.
P.O. Box 1254, Williston, VT 05495
(802) 879-2600

LEAD BASED PAINT TESTING DATA SHEET

ADDRESS: 1007 US Rt. 7, Middlebury, Vermont

Middlebury Workshop

DATE: July 8, 2019

XRF SERIAL NO.: 2471

ROOM EQUIVALENT: 05

INSPECTOR: Todd C. Hobson

READING	COMPONENT	COLOR	SUBSTRATE	COND.	TEST LOCATION/DESCRIPTION	XRF READING (mg/sq. cm)	CLASS
254	Ceiling	White	Sheet Rock	Deter.		- 0.2	Neg.
255	Door	White	Wood	Deter.	Wall C, Door 1	2.0	POS.
256	Door Casing	White	Wood	Deter.	Wall C, Door 1	1.0	POS.
257	Door Jamb	White	Wood	Deter.	Wall C, Door 1	1.0	POS.
258	Door	Grey	Wood	Deter.	Wall A, Door 1, closet	- 0.2	Neg.
259	Shelves	Grey	Wood	Deter.	Wall A, closet	- 0.7	Neg.

- Walls inaccessible, covered with cabinets.
- Door A-2, B-1, B-2, B-3, B-4, D-1, D-2, D-3, and D-4 components are the same as Door A-1.

LEAD CONSULTING ENTITY

CLAY POINT ASSOCIATES INC.
P.O. BOX 1254
WILLISTON, VT 05495-1254

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: LC200999

EXPIRES: Monday, March 23, 2020

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME.
THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to be 'C. L. H.', is located to the right of the text 'COPY OF THIS CERTIFICATE MUST BE ON SITE AT ALL TIMES.'.

LEAD INSPECTOR TECHNICIAN I

TODD C. HOBSON
117 OSGOOD HILL ROAD
ESSEX, VT 05452

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: IT732966

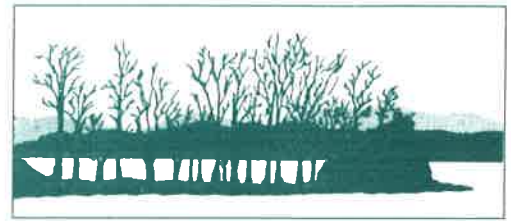
EXPIRES: Wednesday, February 26, 2020

CERTIFICATE OF LICENSE
VERMONT LEAD REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED
OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY
FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.

A handwritten signature in dark ink, appearing to read "V. Hobson", is written over the bottom right portion of the certificate text.



October 16, 2019

Mr. David Donahue
Green Mountain National Forest
231 North Main Street
Rutland, Vermont 05701

Re: Inspection for Universal/Electronic Waste
Middlebury Workshop, 1007 US Route 7 South, Middlebury, Vermont
CPAI Project #15014

Dear Mr. Donahue:

Enclosed is documentation related to professional environmental inspection activities performed by Clay Point Associates, Inc. (CPAI) on July 8, 2019 within the Middlebury Administrative Site, Workshop, 10097 US Route 7 South, Middlebury, Vermont.

During the inspection, CPAI identified all universal/electronic waste inside the building. This inventory did not include underground storage tanks (USTs), or any other subsurface materials/contamination that may be present at the site.

A Drawing depicting CPAI Area Numbers and the Approximate Inventory of Universal/Electronic Waste (Table 1) are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

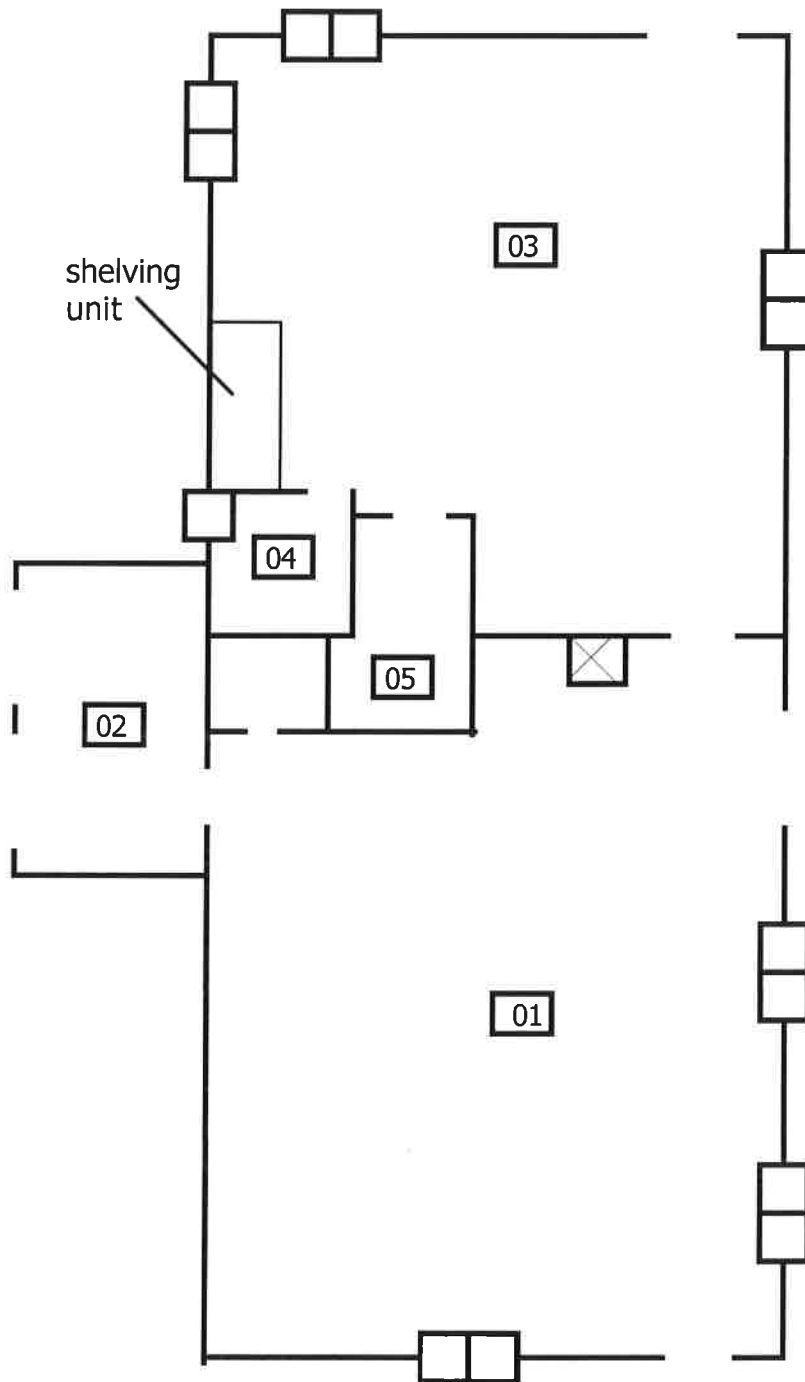
A handwritten signature in blue ink, appearing to be 'Todd C. Hobson', written in a cursive style.

Todd C. Hobson
President

Middlebury Workshop



Project North



00 = CP AI Area Number

Clay Point Associates, Inc.
Project #15014
July 8, 2019

Commercial Structure
1007 US Route 7 South
Middlebury, Vermont

Universal Waste Inspection
Not to Scale
Drawn by: Todd C. Hobson



Table 1
Approximate Inventory of Universal Waste

Building/Addition: USFS/Middlebury Administrative Site
Middlebury Workshop
1007 US Route 7 South
Middlebury, Vermont

CPAI Area No.	Equipment/Item	Approx. Quantity	General Location
01	Fluorescent Light Tubes	24 tubes	On ceiling throughout area.
	Light Ballasts	12 ballasts	On ceiling throughout area.
	Exit Light	1 light	Over door at west wall.
	Fire Extinguisher	2	On south wall, east section and in southwest corner.
03	Fluorescent Light Tubes	16 tubes	On ceiling throughout area.
	Light Ballasts	8 ballasts	On ceiling throughout area.
	Simple Green	1 gallon	On wood stove, at west section.
	Exit Light	1 light	Over door at east wall.
	Fire Extinguisher	1	On floor near oil tank at east wall.
	Thermostat	1	On north wall between doors to CPAI Areas #04 & #05.
04	Fluorescent Light Tubes	2 tubes	On ceiling throughout area.
	Light Ballasts	1 ballast	On ceiling throughout area.